

Exhibit 6

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LUIS GOMEZ-ECHEVERRIA, ET AL.,

Plaintiffs/Counter-Defendants,

vs.

File No. 22-CV-314
Hon. Jane M. Beckering

PURPOSE POINT HARVESTING LLC, ET
AL.,

Defendants/Counter-Plaintiffs.

_____/

DEPOSITION OF LUIS GOMEZ-ECHEVERRIA

Taken by the Defendant on March 7, 2024 at the offices of
Avanti Law Group, 600 28th Street, SW, Grand Rapids,
Michigan, at 9:30 a.m.

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LUIS GOMEZ-ECHEVERRIA v PURPOSE POINT HARVESTING
GOMEZ-ECHEVERRIA, LUIS 03/07/2024

Job 22-CV-314
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2 APPEARANCES:

3 For the Plaintiff: Mr. Benjamin O'Hearn (P79252)
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8 For the Defendant: Mr. Robert Anthony Alvarez (P66954)
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13 Also present: Emilto Morena; Lucille Morena; Robert Alvarez, Jr.;
14 Claudia Gonzalez; Molly Spaak.

15 Interpreter Jose Castillo
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23 REPORTED BY: Ms. Mary B. Howland, CSR0078, CM
24 Certified Shorthand Reporter
25

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Grand Rapids, Michigan

Thursday, March 7, 2024 - 9:30 a.m.

(Whereupon translator was sworn in as follows:)

COURT REPORTER: Do you swear or affirm that you
will accurately translate all questions stated by the
attorneys and all answers given by the witness to the best of
your ability, so help you God?

TRANSLATOR: Yes, I do.

REPORTER: Do you swear or affirm the testimony you
are about to give will be the truth, the whole truth and
nothing but the truth, so help you God?

THE WITNESS: Yes.

LUIS GOMEZ-ECHEVERRIA,
(At 9:25 a.m., sworn as a witness, testified as
follows)

EXAMINATION

BY MR. ALVAREZ:

Q All right. Good morning. Can you please state your name for
the record?

A My name is Luis Eduardo Gomez-Echeverria.

Q How old are you?

A Thirty-four years old.

Q And you are a Guatemalan citizen?

A Yes.

Q What we are doing here today is called a deposition. Have you

1 ever had a deposition taken before?

2 A No.

3 Q Okay. So I'm going to explain basically what we are going to
4 be doing here today. I'm going to ask you a lot of questions.
5 I expect you to answer the questions to the best of your
6 ability. If you don't know the answer to a question, that's
7 okay, just let us know. If you don't understand a question
8 it's okay to ask me to clarify it for you. The only thing I'm
9 going to ask is that when you do say something, that you make
10 sure when you respond to a question that you do verbalize it
11 and don't just nod your head, because we have a court reporter
12 who is here, who is taking notes of everything that's being
13 said in this deposition.

14 A Okay.

15 Q And everything that's being said in this deposition is
16 something that we'll be able to use in the case and
17 potentially at trial.

18 A Okay.

19 Q Do you have any questions before we start?

20 A No.

21 Q One more instruction. There may be questions that I ask you
22 that your attorney may object to. He'll say I object. That's
23 his job. That is what he is supposed to do, okay. There is
24 nothing wrong with that. But unless he instructs you
25 specifically not to answer a question, even if he objects you

1 still have to answer the question. Okay?

2 A Okay.

3 Q Have you ever been involved in any other lawsuits before?

4 A No.

5 Q So this is the first time you've ever been involved in any
6 kind of Court case?

7 A Yes.

8 Q Where are you living now?

9 A Do I answer that?

10 Q Yes.

11 A Because I am nervous that he might do something against me.

12 Q Let me clarify. What state are you living in right now?

13 A In North Carolina.

14 Q And when did you arrive to Michigan?

15 A Yesterday.

16 Q And how did you get here?

17 A By plane.

18 Q Did you come alone?

19 A My brother is also here.

20 Q Who is your brother?

21 A Hervil Gomez.

22 Q Do you know Julio?

23 A Yes.

24 Q Okay. Do you know what his full name is?

25 A All I know is the last name is Julio Chalil.

1 Q Julio Caesar Gomez Moreno.

2 A All I know is Chalil because of his dad.

3 Q Okay. And Julio is also in this lawsuit with you, correct?

4 A I knew that he was on this lawsuit.

5 Q Okay. When is the last time you talked to him?

6 A It's been a long time.

7 Q Like months, year, more than a year?

8 A Yes.

9 Q Which one?

10 A Was long time ago, when he run away.

11 Q That was in 2018, correct?

12 A Yes.

13 Q So you haven't spoken to Julio since 2018?

14 A No.

15 Q How did you know that he was in this lawsuit?

16 A Because he is talking to my lawyers.

17 Q Okay. Who else is in this lawsuit with you?

18 A Do I need to answer that question?

19 Q Yes. Remember unless your attorney instructs you not to
20 answer, you have to answer the questions.

21 A Okay. Estarve Gomez. Darwin Fuentes. Leonel Lopez. And the
22 other person I do not know the name.

23 Q You said Irwin Lopez.

24 A Leonel.

25 Q You said Albi Lopez?

1 A No.

2 Q Leonel. You said Darwin and then you said two more.

3 A First I say Ergil Gomez.

4 Q Ergil Gomez.

5 A I think it is Ergil Gomez. Ergil Miguel Gomez Navarro.

6 Q Ergil Miguel Gomez Navarro.

7 A He has nothing to do with it.

8 Q Okay. So can you give me a little bit of information about
9 who -- oh, I see what you are saying. And do you know
10 Artenio?

11 A By sight.

12 Q So for Artenio, Leonel and Darwin, when is the last time you
13 spoke with them?

14 A I don't talk to them.

15 Q Have you ever talked to them?

16 A No.

17 Q Do you ever message with them?

18 A No.

19 Q Okay. So you don't send What's Up messages to any of them?

20 A No.

21 Q And how do you know they are in this lawsuit?

22 A I'm sorry, can you repeat the question?

23 Q How do you know that they are in this lawsuit with you?

24 A Because they communicate with my lawyers.

25 Q Who are your parents?

1 A Luis Alberto Gomez Castro. Disenia Nemay Echeverria Juarez.
2 Q And your dad, how old is he?
3 A He is around 68 years old.
4 Q What did your dad used to do for a living?
5 A My dad worked with the Government in Guatemala.
6 Q What did he do for the Government?
7 A Policeman.
8 Q How long was he a policeman for?
9 A Approximately for 22 years.
10 Q Do you know when he stopped being a police officer?
11 A I don't remember.
12 Q Was it in the last ten years?
13 A Yes, approximately.
14 Q Okay. Do you have any aunts or uncles?
15 A Yes.
16 Q What are their names?
17 A On my dad's side Sonya Gomez. Arial Gomez. Portenzia Gomez.
18 Q And your mom's side.
19 A Lorana Achamaria. Glenda Achamaria. Suma Achamaria. Lilyana
20 Achamaria. And Alysa Achamaria.
21 Q Now you have a brother named Hervil. Do you have any other
22 siblings?
23 A No.
24 Q Okay. And how do you know Benito?
25 A Because years ago he used to live where we used to live.

1 Q Aren't you related to him?

2 A Yes.

3 Q Okay. So how are you related to him?

4 A His mother is sister with my dad.

5 Q And so did you two grow up together?

6 A No.

7 Q You didn't grow up in the same town?

8 A He is older than I am.

9 Q Okay. When you were in Guatemala, did you see each other at
10 family functions?

11 A He spent a lot of time in the U.S., so I didn't see him very
12 much.

13 Q Okay. When is the last time you spoke to your father?

14 A I call him twice a week just to see how he's doing.

15 Q Do you ever message with him?

16 A No, I just call over the phone.

17 Q I assume you call your mom too, right?

18 A Yes.

19 Q Okay. Are you aware of a case in Guatemala that was filed
20 against your father?

21 A Yes.

22 Q What do you know about it?

23 A Lies.

24 Q Okay. What were the lies?

25 A The workers of the company -- Purpose Point.

1 Q Purpose Point?

2 A Purpose Point, they sue my dad.

3 Q What did they sue him for?

4 A To Purpose Point I don't know the specifics of it.

5 Q You talk to your dad twice a week and he hasn't told you what
6 it's about?

7 A All they say is that they sue my dad and he got a note.

8 Q When was that?

9 A That of what?

10 Q When was it that your dad told you that he had been sued?

11 A About over a month ago.

12 Q And when you speak with him twice a week, do you talk about
13 that lawsuit?

14 A All he said is that he was going to take care of those lies.
15 All he say is how you doing? How is everything?

16 Q What is the last thing that he told you about this lawsuit in
17 Guatemala?

18 A That the workers of Purpose Point sue him.

19 Q Okay.

20 (Exhibit 1 was marked)

21 Q I have handed you what has been marked as Exhibit 1. Can you
22 please take a look at that document. Let me know when you're
23 ready.

24 A Yes.

25 Q What is this document?

1 A It says that who -- what suit didn't show up with proof.

2 Q Have you ever seen this document before?

3 A All I know is that that arrived to him.

4 Q But my question is have you seen this document before today?

5 A All I knew is that he was going to mail that to my lawyer.

6 Q So your dad sent this to your attorneys?

7 A She showed that to them.

8 Q Who is "she"?

9 A Teresa.

10 Q Yes. So did you send this to your attorneys?

11 A I talked to Teresa that my dad wanted to send this document
12 about this suit.

13 Q And how was it sent from your dad to Teresa?

14 A Because it was best for my dad to talk to Teresa to explain
15 the reason why that happened.

16 Q My question is did you or was it your dad that sent this to
17 Teresa?

18 A My dad told me I got this paper, then I took to Teresa
19 directly.

20 Q Okay. So your dad told you that he got this paper, correct?

21 A Yes.

22 Q And then you talked to Teresa about this paper?

23 A Yes, I talked to her about it.

24 Q Did you send this to Teresa?

25 A I told her she was going to receive the paper where they

1 denied what they did.

2 Q So you did not send this to Teresa?

3 A Teresa spoke directly with my dad and then the lawyer.

4 Q Because this is a photo of a document, correct, it is not the
5 document itself?

6 A I'm sorry?

7 Q It happens to all of us. So this is a photo. Who took the
8 photo?

9 A Teresa communicate with my dad and with my dad's lawyer.

10 Q But do you know who took the photo?

11 A That come via What's App, or something like that.

12 Q That is my question. Who sent it?

13 A I repeat Teresa spoke directly with my dad's lawyer.

14 Q So then what you're saying is that it was your dad's lawyer
15 that sent a photo of this document to Teresa?

16 A They had direct communication.

17 Q If you don't know, that's okay, you can say I don't know.

18 A That's fine. I don't know.

19 Q All right. So you don't know how this photo of this document
20 got to your attorneys?

21 A I don't know.

22 Q Okay. Can you, on the photo of this document, can you show me
23 a signature?

24 A Could you repeat that, what you said?

25 Q On the photo of this document, can you show me if there is a

1 signature of any individual on this paper?

2 A No.

3 Q There is no signature on this document, right?

4 A No.

5 Q Is there a seal anywhere, a Government seal anywhere on this
6 document?

7 A You can see here it says the name of the person.

8 Q Yeah, but my question is, is there a seal?

9 A No.

10 Q Is there a stamp indicating the date of when this document was
11 issued by I'm assuming the Court?

12 A Here it says the last information.

13 Q All right. Give me a second here. Do you know who Licensio
14 Hilario Ajanel is?

15 A I don't know.

16 Q Do you know who Nancy Violeta Rivera Maldonado is?

17 A I don't know.

18 Q What is -- what is Auziliar Fiscal?

19 A I don't know.

20 (Exhibit 2 was marked)

21 Q Handing you what's been marked as Exhibit 2. Let me know when
22 you're ready.

23 A Ready.

24 Q Awesome. Still on Exhibit 12, do you know who prepared this
25 document?

1 A No.

2 Q But you said that your dad and your dad's attorney spoke with
3 Teresa about this document?

4 A My dad needed to communicate regarding this.

5 Q Why did they need to communicate about it?

6 A I don't know.

7 Q What did your dad tell you about why they needed to
8 communicate?

9 A To say that that lawsuit was affecting him.

10 Q Can you look at Exhibit 2. Did you tell me what the
11 difference is between Exhibit 2 and Exhibit 1?

12 A This one has stamps.

13 Q It has a signature and looks like a seal, correct?

14 A Yes.

15 Q It also has, at the very top looks like it is on official
16 letterhead.

17 A Yes.

18 Q Have you seen this document before?

19 A No.

20 Q So Exhibit 2, would it surprise you to learn that this is the
21 official document of Exhibit 1?

22 A I don't know.

23 Q Would it surprise you to learn that Exhibit 2 was issued by
24 the public ministry days after this document was sent and/or
25 received by your attorneys?

1 A I don't know.

2 Q Do you know how your dad and his attorney were able to get a
3 copy of an order that was issued by a Guatemalan Court before
4 it was issued?

5 A I know that each person that they did, each person is going to
6 get a copy.

7 Q Yes, that makes sense. But the copy that is usually sent is
8 the official copy with the signature and the stamp from the
9 Court. Not the draft, it looks like, of the official document
10 from the Court. Would you agree?

11 MR. O'HEARN: Object to the form.

12 BY MR. ALVAREZ:

13 Q You can still answer.

14 A I don't know.

15 Q So I will ask you again, do you know how your dad and his
16 attorney were able to get a copy of a form -- of a Court order
17 that had not with yet been issued by that Court?

18 MR. O'HEARN: Object to the form.

19 BY MR. ALVAREZ:

20 Q You still have to answer.

21 A I don't know.

22 Q Remember your attorney is allowed to object, but you still
23 have to answer the question, okay, unless he tells you not to.

24 A Okay. Yes.

25 Q In fact, this document, this official document, Exhibit 2, was

1 issued, I believe it was three or four days after I received a
2 copy of this document from your attorneys, of Exhibit 1.

3 A So what are the dates?

4 Q We will get to that. And your dad probably received the
5 official document a few days later as well. Did he happen to
6 mention when he received the official notice?

7 A He didn't tell me.

8 Q What is the name of your dad's attorney?

9 A I don't know.

10 Q Have you talked to your dad this week?

11 A No.

12 Q When is the last time you spoke to your dad?

13 A Perhaps like a month ago.

14 Q But you spoke to your dad when he was talking to Teresa about
15 this document though, right?

16 A Only -- the only -- he was the one to communicate.

17 Q But you talked to him?

18 A Yes.

19 Q That was within the last month, right?

20 A Yes, that's possible, yes.

21 Q So when I asked you when the last time was that you talked to
22 your dad, you said over a month ago, but that wasn't true.

23 A I didn't say over a month, I said approximately.

24 Q Okay. When exactly is the last time you spoke to your dad?

25 A I don't know exactly.

1 Q Okay. Do you have your phone with you?

2 A No.

3 Q Where did you leave your phone?

4 A In my luggage.

5 Q On your phone would you be able to tell how long it was that

6 you talked to your father?

7 A The person I talk to the most is my mom, I only talk to see

8 how he is doing I don't talk to him very often.

9 Q How do you talk to your mom?

10 A By phone.

11 Q So you call her?

12 A Yes.

13 Q From your phone?

14 A Yes.

15 Q So your phone is going to have a log of the last time you

16 called your mom's number?

17 A In fact I call her area today.

18 Q Did you talk to your dad today?

19 A No.

20 Q Does your dad know that you're going to be here today?

21 A I don't know.

22 Q You talk to your dad twice a week, he tells you at least about

23 what's going on with him, and he tells you about this

24 document, that's missing presumably in the case in Guatemala.

25 He knows, I'm assuming, about this lawsuit here in Michigan

1 correct?

2 MR. O'HEARN: Object to the form.

3 A I don't know if he knows.

4 BY MR. ALVAREZ:

5 Q So you have never told your dad about the lawsuit that you
6 have here against Emilto?

7 A Can you repeat the question, please?

8 Q Of course. You've never told your dad that you're suing
9 Emilto.

10 A Emilto. People talk. They tell my dad that Emilto and I are
11 in a suit.

12 Q But you have never told him on either -- on any of the times
13 that you talked to him every week?

14 A The only thing I told him is not to worry that we were going
15 to be fine.

16 Q Does he ever ask you about what's going on in the cases -- in
17 your case here in the United States?

18 A They always ask me how are you doing.

19 Q Okay. Well, I am a dad. If my son, adult or otherwise, was
20 in another country and was involved in a lawsuit in Federal
21 Court and I spoke with him twice a week, I would ask him about
22 the lawsuit. Are you saying that your dad never asks you
23 about it?

24 A My dad always ask me how I am doing, but I try not to involve
25 them in my problems, because they are my problems not theirs.

1 Q Is this lawsuit against your dad your problem or his?

2 A This?

3 Q Exhibits 1 and 2, yes.

4 A This is what the workers of the company Purpose Point, because
5 the workers did that because Milton and I are involved in a
6 lawsuit.

7 Q But is this your problem or is it your dad's problem?

8 A That problem they are doing that against my dad, when that is
9 supposed to be just between he and I.

10 Q You testified a little bit ago that this lawsuit that you had
11 between you and Milton is between you and Milton, not with
12 your -- not with your dad, right?

13 A Yes. Because of the workers of Purpose Point they are
14 attacking my dad when it is not supposed to be that way.

15 Q So is that lawsuit in Guatemala is that against you or is it
16 against your dad?

17 A Do you have the rest of the document?

18 Q I am the one that is asking the questions here.

19 A Okay.

20 Q So my question was, is this lawsuit in Guatemala against you
21 or is it against your father?

22 A This they are doing this because of the lawsuit that we have
23 between Milton and I.

24 Q But my question again, is this lawsuit against you or is it
25 against your dad?

1 MR. O'HEARN: Hold on. I am going to object to the
2 form of the question. When you are saying against you, I am
3 not sure if it is clear, if you mean it is him as a party or
4 if it is meant to target him directly. Does that make sense?

5 BY MR. ALVAREZ:

6 Q Kind of. I understand what you're saying. Okay.

7 This lawsuit in Guatemala, is your name in this
8 lawsuit?

9 A No, but they are my parents.

10 Q Have you received a notice that you are named in this lawsuit
11 in Guatemala?

12 A No.

13 Q So this lawsuit isn't with you, this lawsuit is against your
14 dad?

15 A It has to do with me because they are workers of Purpose
16 Point.

17 Q So if that's -- if that's true, then this lawsuit by you
18 against Milton then also involves your dad?

19 A They are involving my dad.

20 Q Okay. In your talks with your dad, you say that you don't
21 talk to him about your lawsuit, correct?

22 A Yes, not involved in.

23 Q But he apparently does talk to you about his case?

24 A All he said that the people who work for Purpose Point sue
25 him.

1 Q And then about a week or two ago he also talked to you about
2 the fact that the case was dismissed?

3 MR. O'HEARN: Object to form. I don't think he
4 testified to that.

5 A Could you repeat that?

6 BY MR. ALVAREZ:

7 Q Sure. About a week or two ago, your dad talked to you about
8 the fact that this case had been dismissed? Objection noted.

9 A I don't understand.

10 Q Okay. We can go back. Exhibits 1 and 2, do you know what
11 they say? You read them.

12 A Yes. He said that they didn't show proof against my dad.

13 Q And what else does it say then? As a result of not showing
14 proofs, what does it say happened?

15 A They canceled that suit.

16 Q So they dismissed the lawsuit?

17 A Yes.

18 Q Okay. So your dad talked to you about his case?

19 A Yes, at the beginning.

20 Q And obviously in the last week or two.

21 MR. O'HEARN: Objection again to the form. Isn't
22 this the 9th of February?

23 A I don't remember very well. All I know is that they sue him
24 and I don't know about the dates.
25

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1 BY MR. ALVAREZ:

2 Q Okay. Did you know that the case was reopened?

3 A I don't know.

4 Q Did you know that the workers gave -- some of the workers gave
5 testimony this past Monday?

6 A I don't know.

7 Q Do you know that your dad is supposed to be giving testimony
8 this coming week?

9 A I don't know.

10 Q Because you haven't talked to your dad about it?

11 A No.

12 Q Because when you call, you don't ask him about it?

13 A No.

14 Q And he didn't tell you?

15 A He knows how to resolve that.

16 Q Okay. In 2020 how much money did you make?

17 A What do you mean with that?

18 Q That's fair. Your income in 2020.

19 A I don't know.

20 Q Were you working in 2020?

21 A Yes.

22 Q Okay. What kind of work were you doing?

23 A Painting.

24 Q And how much were you getting paid?

25 A I don't know. Painting, they know the way they pay is based

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1 on your knowledge.

2 Q So based on your experience?

3 A Yes.

4 Q Before 2020 did you have any experience painting?

5 A No.

6 Q And are you painting -- what are you painting?

7 A Homes.

8 Q The exterior or the interior or both?

9 A Both.

10 Q And are you doing this -- were you doing this in North
11 Carolina in 2020?

12 A Yes.

13 Q And so when you started working as a painter. How much were
14 you getting paid?

15 A Approximately \$13.

16 Q Okay. And how many hours would you work a week?

17 A Approximately nine hours.

18 Q A day or a week?

19 A Sometimes we used to work every day. Sometimes we used to
20 work Monday through Saturday. Sometimes Monday through
21 Thursday.

22 Q Does it depend on the season too?

23 A It depends on the company if they have enough work.

24 Q Is there certain periods of time in the year where it's more
25 work versus less work?

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1 A No, that depends on the company.

2 Q Okay. So in 2020, when did you start working as a painter?

3 A Soon as I left Purpose Point.

4 Q That was like in November of 2019, correct?

5 A Yes, approximately.

6 Q Okay. And so how long after you left Purpose Point were you
7 able to find a job as a painter?

8 A When I arrived I start working after one week.

9 Q Did you already know someone in North Carolina?

10 A Just acquaintance.

11 Q Like who?

12 A I don't know, because -- I'm sorry, I couldn't understand. I
13 cannot tell you who, because I cannot expose them because of
14 Milton.

15 Q Just for the record, Emilto Moreno is Milton for the record.

16 A Can you repeat that?

17 Q When you refer to Milton, he is referring to Emilto Moreno the
18 defendant?

19 A Yes, I was confused about that.

20 Q That's okay.

21 A Okay.

22 Q All right. We already knew that you lived in North Carolina.
23 Your attorneys told us a while ago. You knew that, right?

24 A There were certain things you need to know, so I need to tell
25 you more or less where. But I was afraid, I still many afraid

1 because he was always looking wherever Julio and I were.

2 Q What are you afraid of?

3 A For him to do anything against us.

4 Q Like what?

5 A Because we escape.

6 Q But what do you think he is going to do to you in North
7 Carolina?

8 A I don't know.

9 Q So what are you afraid of then?

10 A That anything could happen.

11 Q Like what specifically?

12 A I couldn't tell you specifically.

13 Q So you're afraid, but you don't know of what?

14 MR. O'HEARN: Objection to form.

15 A For him to do something.

16 BY MR. ALVAREZ:

17 Q I understand. I am just trying to understand what
18 specifically you think he can do to you in North Carolina.

19 A I don't know. Really I don't know.

20 Q Okay. So then going back to these acquaintances, what are the
21 names of these acquaintances?

22 A Why do I need to tell?

23 Q Sir, you have to answer the question.

24 MR. O'HEARN: I am going to object. He is clearly
25 afraid of retaliation.

1 BY MR. ALVAREZ:

2 Q Unfortunately he hasn't articulated any reason for it and what
3 he is afraid of. So unless you are going to stop the
4 deposition right now and go file for protective order, which
5 is the proper procedure, he has to answer the question. I am
6 not even asking for an address or an employer's name. All I
7 am asking is how did you know about this job. So who are
8 these people that you knew in North Carolina?

9 A Just some acquaintance.

10 Q Great. What are their names?

11 A Xavier.

12 Q Xavier? Last name?

13 A Cassas.

14 Q How do you know Xavier Cassas?

15 A When I arrived to North Carolina I start talking to him and
16 ask him if there is work available.

17 Q You said you knew people in North Carolina before you got
18 there. That was your testimony. That's why I asked you who
19 did you know?

20 A He was the one who gave me the work.

21 Q You just told me that you met him and started talking to him
22 when you got to North Carolina.

23 A Yes, because he gave me work.

24 Q So had you been talking to Xavier before you got to North
25 Carolina?

1 A Xavier is one of my friends.
2 Q Great. How do you know Xavier?
3 A Because he is one of my friends.
4 Q He was an acquaintance first. Now he is a friend?
5 A Acquaintance, a friend is the same.
6 Q Fair enough. So how long have you known Xavier Cassas?
7 A Years. Years.
8 Q When was the first time you met him?
9 A I don't remember the date.
10 Q Was it before 2019?
11 A No.
12 Q So you first met him in North Carolina?
13 A When I got there, that is when I met him.
14 Q So you didn't know him before you got to North Carolina?
15 A All I knew was his name.
16 Q How did you know his name if you didn't know him?
17 A Because of my friend.
18 Q What is that friend's name?
19 A Cesillio.
20 Q What is his last name?
21 A Cerevantes.
22 Q And Cesillio. How long have you known Cesillio?
23 A We just chat.
24 Q On the phone?
25 A Yes, sometimes.

1 Q So did you know him before 2019?

2 A Yes, he used to talk to me.

3 Q When did you first meet Cesillio?

4 A I don't remember the date.

5 Q Was it before 2019?

6 A Was in 2019, possible, but I don't know date.

7 Q In 2019 you were working at Purpose Point, correct?

8 A Yes.

9 Q Where was Cesillio working?

10 A He was working here in Michigan.

11 Q Where?

12 A Here for Oceana.

13 Q In Oceana County?

14 A Around there.

15 Q What was he doing?

16 A He used to sometimes come to work here in Michigan.

17 Q What kind of work?

18 A Regarding the harvest.

19 Q Was he coming here from another country, like you?

20 A No.

21 Q What country is he from?

22 A Mexico.

23 Q How old is he?

24 A Approximately like 40 years old.

25 Q When is his birthday?

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1 A I don't know.
2 Q What does he look like?
3 A A little bit shorter than I am, darker skin.
4 Q He is from Mexico?
5 A Yes.
6 Q What part of Mexico?
7 A He is from Oaxaca. That is where he has his family.
8 Q Does he have a wife?
9 A He is single.
10 Q Does he have kids?
11 A All grown up with families.
12 Q When is the last time you spoke to him?
13 A He asks how are you doing? How are things going?
14 Q When was the last time that you talked to him?
15 A I see him in North Carolina.
16 Q You never call him?
17 A We just talk like here are my friends, just in person.
18 Q Do you work together?
19 A No, we work in different places.
20 Q Do you live close to each other?
21 A No. He always goes to different states to work now.
22 Q What kind of work does he do now?
23 A Plumbing, electrician.
24 Q What's his phone number?
25 A I don't have my cell phone.

1 Q But it is saved on your phone?

2 A I would say he just calls me because of this. I want to keep
3 him far away. It is just a chat between friends.

4 Q What about Xavier, do you have his phone number?

5 A No.

6 Q So you got these friends, acquaintances, but no friends that
7 you talk with that you see on a regular basis, but you don't
8 have their phone numbers in your phone? That is your
9 testimony here today under oath?

10 A You are asking if I have acquaintance. They are my
11 acquaintance. They are my friends.

12 Q I asked you how you were able to get a job within a week in
13 North Carolina. You are the one who told me it was because
14 you had some friends that you knew in North Carolina.

15 A Yes.

16 Q See it makes sense that I would want to know how did you know
17 these people and you told me Xavier Cassas and now Seville
18 Cerevantes. But these are two people that you know from North
19 Carolina, one whom you just testified to you see on a regular
20 basis, and you're telling me you don't have their phone
21 numbers saved on your phone. I am not going to hold you to
22 your memory because I barely remember my friend's phone
23 numbers too, but I have them all saved on my phone.

24 MR. O'HEARN: Object to the form.

25

1 BY MR. ALVAREZ:

2 Q So is your testimony that those two people who are your
3 friends you don't have their phone numbers in your phone?

4 MR. O'HEARN: Object to the form.

5 A You're asking me if I have saved it. You're asking me if I
6 had it in my phone.

7 BY MR. ALVAREZ:

8 Q Either way. Do you have a way to contact them?

9 A I don't save them specifically with names, simply we just
10 talk.

11 Q So if you wanted to talk to Xavier or Cesillio right now, how
12 would you do that?

13 A I see them in North Carolina.

14 Q Because you don't have their phone numbers saved in your phone
15 is what you are saying?

16 A I don't have it saved by name just like that.

17 Q How do you have them saved?

18 A They just call me to ask how are you doing, just say hey,
19 Xavier, hey, Cesillio, say hey, how are you.

20 Q So they have to have your number right, to call you?

21 A Yes.

22 Q So you're saying that you're the kind of friend that never
23 calls his friends?

24 MR. O'HEARN: Objection.

25 A I see them in North Carolina.

1 BY MR. ALVAREZ:

2 Q But unless you see them, you don't ever call them?

3 A Other than we just say hey, how are you, how is things going
4 there?

5 Q Xavier and Cesillio don't really exist, do they?

6 MR. O'HEARN: Objection to form.

7 A Yes.

8 BY MR. ALVAREZ:

9 Q How old is Xavier?

10 A Thirty years old.

11 Q He is closer to your age?

12 A Yes.

13 Q Where is he from?

14 A Mexico.

15 Q What part of Mexico?

16 A Oaxaca.

17 Q Do Cesillio and Xavier know each other?

18 A They are like neighbors.

19 Q Okay. So they are neighbors?

20 A Like Grand Rapids to Oceana.

21 Q Not neighbors. They are like an hour and a half away?

22 A I don't know how to explain that.

23 Q Do you, Xavier and Cesillio ever hang out together?

24 A That is just a few times.

25 Q Do you know -- okay. So it was Xavier that helped you get the

1 job in North Carolina?

2 A Yes. He was the one who said look, there is work there.

3 Q When did he tell you this?

4 A When I left here I met him there.

5 Q What made you want to go to North Carolina? Of all of the
6 states, why did you pick North Carolina?

7 A I just left.

8 Q Okay. But how did you pick North Carolina?

9 A I just went to North Carolina.

10 Q So earlier you testified that you went because you had friends
11 there. Now you are saying that you just kind of randomly went
12 and ended up in North Carolina?

13 MR. O'HEARN: Object to the form.

14 A Cesillio is my friend. He was going to North Carolina. So I
15 went to North Carolina.

16 BY MR. ALVAREZ:

17 Q Okay. Great. So you met Cesillio here in Michigan not in
18 North Carolina?

19 A From the beginning I said I met Cesillio here and then I said
20 I met Xavier there in North Carolina.

21 Q So you and Cesillio traveled together from Michigan to North
22 Carolina?

23 MR. O'HEARN: Object to the form.

24 A I don't know.

25

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1 BY MR. ALVAREZ:

2 Q You don't remember?

3 A I don't know.

4 Q Did you go by yourself?

5 A I don't know.

6 Q Who is Suma Echeverria?

7 A My aunt.

8 Q Where does she live?

9 A I don't know in what area in North Carolina.

10 Q So you knew people in North Carolina that were family members?

11 A I know that she lives in North Carolina.

12 Q Did you talk to her before you came to North Carolina in 2019?

13 A My Aunt Suma came to visit us here in Michigan when we came.

14 Q When was that?

15 A I don't remember.

16 Q Was it in 2019 before you left?

17 A I didn't go in 2018.

18 Q No, I said 2019. Sorry.

19 A I don't know, I don't remember.

20 Q You've been living in North Carolina since 2019, correct?

21 A Yes.

22 Q Have you had contact with your aunt in all those years?

23 A No.

24 Q None whatsoever?

25 A No.

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1 Q Did you have a fallout with her?

2 A No.

3 Q But you don't talk to her?

4 A No.

5 Q You don't go visit her at her house?

6 A No.

7 Q You don't celebrate holidays with her?

8 A No.

9 Q Do you have any other family in North Carolina?

10 A My sister.

11 Q Your sister or your brother?

12 A Brother.

13 Q Sorry. Any other family members?

14 A Not that I know of.

15 Q All right. So you started working as a painter within a week
16 of arriving in North Carolina. And you were making \$13 an
17 hour?

18 A Yes.

19 Q So in January of 2020 you were still living in North Carolina
20 and working as a painter?

21 A So in 2020 and on.

22 Q Okay. For how many different employers have you worked?

23 A I haven't changed many bosses to say.

24 Q Is it two? Is it three?

25 A Perhaps.

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1 Q Well, which is it, two or three?

2 A I don't know.

3 Q You don't know how many places you have worked at since 2020?

4 A Places.

5 Q Employers.

6 A I don't switch bosses very often.

7 Q Okay. So let's go one by one then. 2019 when you arrive, you
8 start working with one employer, right? I am not going to ask
9 you the name, don't worry about that. But you started working
10 with one employer, correct?

11 A Yes.

12 Q How long did you work for that employer?

13 A You don't know exactly for how long?

14 Q Was it all of 2020?

15 A Yes.

16 Q 2021?

17 A Yes.

18 Q 2022?

19 A No, I was working with one more.

20 Q Okay. So in 2022 you worked part of the year with a new
21 employer?

22 A Sometimes they didn't have work there. He would say go out, I
23 have this friend.

24 Q So you could have been working for two employers at the same
25 time?

1 A No. Like if he needed help, we go there and help him.
2 Q But you were still getting paid by the first employer?
3 A He would say that friend needs for you to help him, so go
4 ahead and work for him.
5 Q Since 2022 have you worked for another employer?
6 A Yes, after that yes, I work.
7 Q With another employer?
8 A Yes, with a different company.
9 Q Okay. So going back to the first employer, in 2020 you were
10 getting paid \$13 an hour. Did you get a raise at all in 2020?
11 A It depended on the companies.
12 Q Well, so your hourly pay changed?
13 A It went up a little bit.
14 Q To what?
15 A One dollar.
16 Q So you went from \$13 to \$14 an hour?
17 A Yes.
18 Q Do you remember when you got that raise to \$14 an hour?
19 A I don't know.
20 Q Was it the end of 2020? Was it mid 2020?
21 A I don't know.
22 Q How many hours would you work a week?
23 A Depends on the company.
24 Q On average?
25 A I cannot give you an estimate.

1 Q How much money would you make every week?

2 A 700 perhaps.

3 Q Were you paid every week or every two weeks or twice a month?

4 A That all depends on them. They will talk to us about that.

5 Q In 2020 the first employer, how would he pay you? Every week?

6 Every other week? Or twice a month? Or once a month?

7 A That depended on him.

8 Q So you could go weeks sometimes without getting pay?

9 A He would pay like one week and then he would pay like 15 days.

10 Q And you said you sometimes worked seven days a week and other
11 times you may not have worked a full week?

12 A I didn't say I work a full week.

13 Q How many days a week would you typically work?

14 A I don't know how to tell you exactly, because that depended on
15 the companies.

16 Q Well, if you were getting \$700, that's divided by \$13 an hour
17 that is 53 hours, almost 54 hours. Was that in a week or did
18 you only work part of the week?

19 A Can you repeat that, please?

20 Q Sure. You testified earlier that you got paid \$700. And we
21 know, because you testified, that you get paid \$13 an hour.
22 So if I divide 700 by 13 that's about 54 hours. So were you
23 working 54 hours a week for those \$700?

24 A I said that I was getting 700, but the company sometimes we
25 were working Monday through Saturday, sometimes just part of

1 the week.

2 Q Okay. So what is the least amount of days that you worked in
3 a week?

4 A Four days.

5 Q Nine hours a day?

6 A I cannot tell you exactly a number of hours.

7 Q On average?

8 A I couldn't tell you an average.

9 Q Your paychecks, were they regular?

10 A What do you mean regular?

11 Q Would you sometimes go weeks without getting paid?

12 A Sometimes they pay me once a week sometimes 15 days.

13 Q With the same employer?

14 A Yes. In 2020 and 2021.

15 Q Okay. In 2022 did that change?

16 A Changed in which way?

17 Q Did you get paid -- did you get paid weekly or every two weeks
18 or once a month?

19 A The same.

20 Q Which is how much?

21 A In one week or in 15 days.

22 Q How much would you make in a month?

23 A I don't know.

24 Q What is the least amount that you would make in a month?

25 A I don't know exactly.

1 Q You don't know or you don't remember?

2 A Just say if I didn't remember I could say I don't know. So I
3 don't know.

4 Q Yes, and I'm just establishing that you don't remember how
5 many hours you typically worked and how much you got paid on a
6 monthly basis, right?

7 A That's fine.

8 Q Month of February 2024, how much did you make?

9 A How much is what I start making or how much I am making?

10 Q How much did you make the entire month of February of 2024?

11 A I don't know.

12 Q You don't remember?

13 A No.

14 Q Okay. Do you remember how many hours you worked last week?

15 A Thirty-two hours.

16 Q How much are you getting paid an hour?

17 A Right now 16.

18 Q So you made last week \$512?

19 A Yes, approximately.

20 Q Well, 13 times 32 is 512. Okay. Now do you get taxes taken
21 out of your paycheck?

22 A Yes.

23 Q So how much will your check be for that week?

24 A For this week?

25 Q For last week from the \$512.

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1 A They deduct 4 percent.

2 Q Why is it 4 percent?

3 A I don't know.

4 Q Do you get paid in check or paid in cash?

5 A With a check.

6 Q Okay. And in 2020, 2021 and 2022 were you paid in cash or in
7 a check?

8 A It depends, cash or check.

9 Q In 2020, 2021 and 2022 did you file your taxes?

10 A I cannot do those.

11 Q So you didn't file your taxes then?

12 A I cannot do that.

13 Q Did your employer give you a W-2 form or a 1099 form?

14 A Yes.

15 Q Do you still have those?

16 A I don't remember. They are saved somewhere.

17 Q Do you have the one from 2023?

18 A I don't know where they are.

19 Q Your Aunt Suma and her husband, do they work in painting?

20 A As far as I know he works in painting.

21 Q Have you ever worked with them?

22 A No.

23 Q Because you haven't had contact with them in all these years,
24 right?

25 A No.

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1 Q So in 2020 you don't know how much you made in income for that
2 year, correct?

3 A No, I do not.

4 Q In 2021 do you remember how much money you made that year from
5 your employment?

6 A I don't know exactly.

7 Q In 2022 do you remember how much you made from your -- in
8 income from your work?

9 A I don't know exactly.

10 Q In 2023 this last year, do you remember how much you made that
11 year?

12 A I don't remember exactly.

13 Q Okay. Now would be a good time for a break. Let me
14 doublecheck something here real quick. All right. This next
15 part I have a lot of documents to go over, so I want to plan
16 ahead here. Do you guys want to work through lunch or do you
17 want to take a break for lunch? What would you like to do?
18 Off the record.

19 (At 11:10 a.m. off the record)

20 (At 11:21 a.m. on the record)

21 BY MR. ALVAREZ:

22 Q All right. Luis, do you have a cousin named Wendy?

23 A Yes.

24 Q Would you be surprised to learn that Wendy actually confirmed
25 that you went to your Aunt Suma's house when you went to North

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1 Carolina in 2019?

2 A That I went to see my Aunt Suma?

3 Q That when you left in 2019 from Purpose Point, that you went
4 to your Aunt's house in North Carolina to Suma's house?

5 A That's a lie.

6 Q Okay. So that's not true then?

7 A At any moment I haven't gone to visit my Aunt Suma.

8 Q Your brother either?

9 A I don't know.

10 Q You don't know if your brother has gone to visit your Aunt?

11 A That you have to ask him.

12 Q Do you two live together?

13 A With whom?

14 Q With your brother.

15 A In Guatemala.

16 Q In North Carolina.

17 A No.

18 Q Okay. In 2019 when you went to North Carolina was your
19 brother in North Carolina?

20 A My brother, yes, he was there.

21 Q Was he living in North Carolina?

22 A Yes.

23 Q Was he living by himself?

24 A I don't know that.

25 Q You don't know? You didn't go see him?

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1 A No.

2 Q So when you got to North Carolina in 2019, you didn't go see
3 your brother?

4 A No.

5 Q So how long after you got to North Carolina did you see your
6 brother?

7 A I haven't visited my brother.

8 Q Since 2019 you haven't spent time with your brother?

9 A You're asking me if I have visited my brother. I haven't
10 visited my brother.

11 Q Do you know where he lives?

12 A All I know is he lives in another place in North Carolina.

13 Q So not in the same city?

14 A No.

15 Q And you have never been to his house?

16 A No.

17 Q And he's never been to your house?

18 A He's been with other acquaintance and then he said where are
19 you and then he said come here and eat and then that's where
20 we visit.

21 Q So in 2019 for Christmas, did you see your brother on
22 Christmas Day?

23 A Can you repeat the question, please?

24 Q Sure. Christmas 2019, did you see your brother?

25 A No.

1 Q Okay. When is his birthday?
2 A Mine?
3 Q Your brother's.
4 A September the 12th.
5 Q Okay. In 2020 did you go visit your brother at his house?
6 A No.
7 Q Did your brother come visit you at your house?
8 A I don't remember.
9 Q Is it possible?
10 A I don't know.
11 Q Okay. For his birthday, did you see him on his birthday in
12 September 2020?
13 A I don't remember.
14 Q 2021 did you visit your brother at his house?
15 A No.
16 Q Did he visit you at your house?
17 A Not at my house, no.
18 Q Okay. In 2022 did you visit your brother at his house?
19 A No.
20 Q Did he visit you at your house?
21 A In one occasion one time.
22 Q Great. When was that?
23 A I don't know.
24 Q Was it a special occasion?
25 A No.

1 Q Okay. So that was 2022. And you said you visited once.

2 A Yes.

3 Q Was it more than once or just the one time?

4 A Just one time.

5 Q Okay. Last year, 2023, did you go visit your brother at his
6 house?

7 A No.

8 Q Did he go visit you at your house?

9 A In one occasion I believe.

10 Q When was that?

11 A I don't remember.

12 Q This is just last year, you don't remember when your brother
13 came to visit?

14 A Of course you are asking me for the date, the date I don't
15 remember.

16 Q Do you remember what month?

17 A I don't remember.

18 Q Was it in the beginning of 2023 or towards the end of 2023?

19 A I don't remember exactly to tell you the truth.

20 Q How far away does your brother live from where you live?

21 A I don't know.

22 Q You don't know how far away it is from your house?

23 A I don't know.

24 Q Do you know how far away your aunt lives from your house?

25 A I don't know.

1 Q Okay. Have you ever worked with your brother in North
2 Carolina?

3 A No.

4 Q Do you live alone in North Carolina?

5 A Yes.

6 Q Do you have a girlfriend?

7 A Friends. Just friends.

8 Q Friends that are women?

9 A Yes. Just to say hi, Luis, hi/bye.

10 Q Are you in a relationship with any woman?

11 A We just talk. Simply talk.

12 Q Okay. Who is the most recent romantic relationship you had?

13 A I have an ex.

14 Q What is your ex's name?

15 A Do I need to tell you her name?

16 Q Yes.

17 A You are going to get upset at me. Can I ask you why?

18 Q I am the one asking you the questions.

19 MR. O'HEARN: I think I am going to object in terms
20 of relevance.

21 MR. ALVAREZ: Unless you are going to file a
22 protective order he has to answer the question.

23 MR. O'HEARN: We are getting pretty far away.

24 MR. ALVAREZ: I don't think so.

25 MR. O'HEARN: Can you give me some reason?

1 BY MR. ALVAREZ:

2 Q I don't have to.

3 So what was your ex-girlfriend's name?

4 A Ex-girlfriend?

5 Q That is what you said.

6 A Ex-partner.

7 Q Okay. So ex-partner. What do you mean by partner?

8 A Ex-wife.

9 Q Okay. So your ex-wife. What is your ex-wife's name?

10 A Cathalyn.

11 Q Kathleen?

12 A Cathalyn.

13 Q Cathalyn. Okay. Cathalyn is your ex-wife?

14 A Yes.

15 Q So that means you married her?

16 A Just together.

17 Q Okay. So you didn't get married civilly, you were just
18 together?

19 A We were. We were. Yes.

20 Q When did you meet Cathalyn?

21 A When I was single.

22 Q In Guatemala?

23 A Yes.

24 Q How old was she?

25 A I don't remember exactly.

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1 Q How old were you?

2 A I don't remember exactly.

3 Q Would it surprise you that we know that she was 15 when you
4 met her?

5 MR. O'HEARN: Object. I think at this point in time
6 we are going to -- it is an attempt to harass and intimidate.

7 MR. ALVAREZ: How?

8 MR. O'HEARN: The age is completely irrelevant in
9 this case.

10 MR. ALVAREZ: We are establishing the relationship.
11 I asked him about relationships.

12 MR. O'HEARN: I am going to instruct him not to
13 answer.

14 MR. ALVAREZ: So you want to stop the deposition and
15 file for protective order?

16 MR. O'HEARN: I would prefer we keep the deposition
17 going on relevance grounds. He has made a big trip to get
18 here today. If we have to stop the deposition, it would be a
19 hardship to restart it. I think it makes a lot more sense to
20 keep going on relevant grounds and then if you still want to
21 pursue this at the end we can pursue a protective order. Then
22 and at least you will have everything you need for your case.

23 MR. ALVAREZ: The problem here, Ben, is that I am
24 allowed to ask questions unless there is a specific reason why
25 I can not ask that question or ask the questions about his

1 wife, his spouse who is going to be a witness in this case.

2 You have no grounds to ask for protective order. She is going
3 to be a witness and we have already listed her in our initial
4 disclosures. It is not like it is a surprise. So unless you
5 have a specific reason why it's prejudicial, I am allowed to
6 ask these questions about his wife. His partner he testified.

7 MR. O'HEARN: Discovery is limited to what is
8 relevant. This is not relevant.

9 MR. ALVAREZ: In a deposition, that is not an
10 allowable objection. Relevance is not, okay. So either he
11 can answer the question or you might as well file your motion
12 for protective order. I am going to go down the road. I have
13 to ask about his wife. It is not like it is some random
14 person. It is not like it was some random girlfriend. It is
15 his wife, the person whom he has spoken to the last several
16 years. We know because we have talked to her. The person who
17 knows what his thoughts were back in the day during 2018,
18 during 2019, during 2017 and she is an identified witness. So
19 again, he answers the question or you go and file your motion.
20 What would you like to do?

21 MR. O'HEARN: Can we break for a bit?

22 MR. ALVAREZ: Sure.

23 (At 11:37 a.m. off the record)

24 (At 11:42 a.m. on the record)

25 MR. ALVAREZ: Back on the record. So what are we

1 doing?

2 MR. O'HEARN: He can answer your questions. I would
3 ask the professional courtesy when you objected at Emil's
4 deposition, I would ask about his criminal history, you felt
5 it was intended to harass and I backed off.

6 BY MR. ALVAREZ:

7 Q I also remember that we did allow questioning regarding the
8 fraud and all of that, right. This is specifically for a
9 witness. Just for the record, this is specifically for a
10 witness that we are going to be calling to testify and it is
11 his wife whom he has identified as his wife. So it is a
12 completely different matter. If it was just some random
13 woman, I thought that is where he was going. He is the one
14 who brought up his wife.

15 So Luis, your common law wife we will call her,
16 because you are not really married, correct? Is that true?

17 A What do you mean with that?

18 Q Well, in Spanish we would say pareja de hecho, but I don't
19 know how to say it in English. It translates to common law
20 wife. So you are in a, you call her your wife, you treated
21 her as your wife, you have children with her, correct?

22 A Yes.

23 Q Okay. How old were you when you met your wife?

24 A I don't remember exactly.

25 Q And would it surprise you to know that she was 15 when you met

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1 her?

2 A I don't know.

3 Q How long after you met her did she become pregnant?

4 A Maybe like a year and a half possibly.

5 Q Is that what you think she is going to say?

6 MR. O'HEARN: Objection. Form.

7 A I don't know exactly.

8 BY MR. ALVAREZ:

9 Q When was your first child's born?

10 A I don't remember exactly. I don't remember exactly.

11 Q So you don't know your first borne child's date of birth?

12 A Yes.

13 Q So when was it?

14 A It is on the 30th of April.

15 Q What year?

16 A I don't remember exactly. It was around --

17 Q What year did you meet your wife?

18 A I don't remember exactly the year.

19 Q Okay. After you met, how long after you met did you two live
20 together?

21 A So I met her, we played basketball -- basketball and then we
22 play, and we met like that.

23 Q But my question was, how long after you met did you and her
24 start living together?

25 A I couldn't tell you exactly how long, months, days or weeks.

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1 Q Okay. But you did live together at some point?

2 A Yes.

3 Q Did you live together at your parent's home?

4 A Yes.

5 Q How long did you live together?

6 A Till 2019 I would say.

7 Q Okay. So 2017 you were living together in Guatemala?

8 A Yes.

9 Q In 2018 you two were still living together in Guatemala?

10 A Yes.

11 Q And in 2019 at least until you left Michigan for North
12 Carolina you two were living together in Guatemala?

13 A Could I say something?

14 Q Sure.

15 A How to explain this. You know how difficult it is to talk
16 about her. Don't laugh. You know why I am telling you this
17 because when I used to travel working for the company, Purpose
18 Point, she betray me. How you been betrayed by your wife or
19 your partner.

20 Q How did she betray you?

21 A She cheated me with somebody else. When I was here in
22 Michigan getting up at 10:00 a.m. working until 10:00 p.m. it
23 was daily. I was every month, I was every week.

24 Q She cheated on you is what you are saying?

25 A Yes. And you are asking me questions about her.

1 Q I understand it must be difficult.

2 A But for him not to laugh at me, because he was laughing at me.

3 Q I didn't see him laughing at you.

4 A Because you were looking at me, not to him.

5 Q Well, so I have to ask you these questions, sir. I am not
6 trying to make this personal. I have to ask you these
7 questions.

8 A But for him not to laugh because he is making fun of me.

9 Q I will instruct him to keep his emotions in check. But I have
10 to ask you these questions. This isn't personal, just like
11 it's not personal for Mr. O'Hearn with my client. Okay. We
12 are just doing a job. I can see the pain on your face. I
13 don't know where it's coming from, but I can see it.

14 A I am telling you where it's coming from, that is why I am
15 explaining that to you.

16 Q And that is your story. You, I'm sure, know that your wife
17 has a completely different story. But we can deal with that
18 later. For right now in 2019 you were still living or she was
19 still living in your parent's home with you, correct?

20 A She went to her parent's house.

21 Q When was that?

22 A I would say it was around June or something like that. I
23 don't know exactly.

24 Q Could it have been July 2019?

25 A I don't remember exactly.

1 Q Okay. So it could have been later. It could have been
2 earlier is what you are saying?

3 A Yeah. Because she used to go and visit her parents. She used
4 to go visit them.

5 Q What you can be sure of though is that she moved out of your
6 parent's house while you were still in Michigan?

7 A Yes.

8 Q Okay. When was the last time you spoke with her?

9 A I don't remember exactly.

10 Q Did you try calling her recently?

11 A I don't remember. She has another partner. She has another
12 family.

13 Q So you haven't tried to reach out to her about this lawsuit in
14 the last 30 days?

15 A No.

16 Q Okay. What are the last four digits of your cell phone
17 number?

18 A 1300.

19 Q That is your cell phone?

20 A Mine?

21 Q Yes.

22 A Yes.

23 Q Remember you have to -- you have to verbalize.

24 A Thank you.

25 Q In 2017 -- well, before we go down that road. Do you know

1 what a class action lawsuit is?

2 A No.

3 Q Do you know what a class action representative is?

4 A No.

5 Q Do you know that in this lawsuit you're being tasked with
6 representing the interests of not just your own, but
7 approximately 60 some other people?

8 MR. O'HEARN: Object to form.

9 A Could you repeat that?

10 BY MR. ALVAREZ:

11 Q Sure. You know you are in a lawsuit, right?

12 A Yes.

13 Q And in that lawsuit you're suing for what's happened to you,
14 correct?

15 A Can you be specific about that?

16 Q In this lawsuit you are suing Milton, Lucille and the company
17 Purpose Point.

18 A Yes.

19 Q For what you say they did to you, correct?

20 A Yes.

21 Q In 2017, 2018 and 2019, correct?

22 A I don't know what you are referring to specifically with that.

23 Q In this lawsuit you claim that they violated your rights the
24 three years that you worked for Purpose Point.

25 A Oh, yes.

1 Q Okay. So as part of that lawsuit you are also asking that the
2 Court appoint you as a representative of everyone else who
3 worked in 2017, 2018 and 2019 as a class representative.

4 A Regarding the reason for sue?

5 Q So you know that?

6 A I still don't understand.

7 Q In this lawsuit, do you think you are suing just for yourself?

8 MR. O'HEARN: Object to form.

9 A We sue Milton. Because from 2017, 2018 and 2019 we used to
10 give him money to travel with, because in 2017, 2018, 2019 we
11 were giving -- we were giving money to Milton for travel with
12 a Visa H-2A.

13 Q When you say "we," who are you talking about?

14 A Like for instance my brother Hervil Gomez.

15 Q Who else?

16 A Melvin Fuentes.

17 Q Who else?

18 A Eyolquin Lopez and I don't know the name of the others.

19 Q Okay. Antulio?

20 A Okay. Antulio, yes.

21 Q So as far as you understand it, you and those people that you
22 just named are suing Milton, Lucille and Purpose Point?

23 A They are suing Milton, yes.

24 Q And Lucille and Purpose Point, the company?

25 A Yes.

1 Q Okay. Are you suing for anybody else?

2 MR. O'HEARN: Object to the form.

3 A What do you mean suing for somebody?

4 BY MR. ALVAREZ:

5 Q Well, you are suing for what he did to you. The others are
6 suing for what he did to them, correct?

7 A I'm suing Milton because he robbed from me and Hervil is suing
8 Milton because he stole from him. And Antulio.

9 Q Yes, I understand that. We are on the same page. But are you
10 also suing for anybody else?

11 MR. O'HEARN: Object to the form.

12 A I am suing Milton for what he stole, for what he did to me.
13 We all are suing him.

14 BY MR. ALVAREZ:

15 Q By all, you mean yourself, your brother, Julio, Antulio,
16 Darwin and Jonette, correct?

17 A Yes.

18 Q Okay. Who is Alber -- Alber Elpidio Merida Avila?

19 A A worker of Purpose Point.

20 Q Okay. What year did he work?

21 A I don't remember exactly.

22 Q Do you know when he started working?

23 A I don't remember.

24 Q Do you know if he worked in 2017?

25 A No, because in 2017 we only work fourteen.

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1 Q Do you know if he worked in 2018?

2 A I don't remember exactly.

3 Q Do you remember if he worked in 2019?

4 A I think, yes, I think.

5 Q Did you work with him?

6 A No.

7 Q Do you know what day he started working in 2019?

8 A I don't know.

9 Q Do you know how many days a week he worked?

10 A I don't know.

11 Q Do you know how many hours a day he typically worked?

12 A Ever? I don't know.

13 Q When is the last time you spoke with Alber?

14 A I don't remember.

15 Q Have you talked to him about this lawsuit?

16 A No, I don't talk very often with people.

17 Q Are you suing on his behalf too?

18 MR. O'HEARN: Objection to the form.

19 A Why are you asking that to me?

20 BY MR. ALVAREZ:

21 Q I am just asking the question.

22 A I don't -- I don't know precisely talking to Alber for you to
23 be asking me that.

24 Q You are not suing for him either then?

25 MR. O'HEARN: Object to the form.

1 A I don't talk to Alber.

2 BY MR. ALVAREZ:

3 Q Do you know if Alber -- strike that. Are you representing or
4 wanting to represent Alber in this lawsuit against Milton?

5 MR. O'HEARN: Object to form.

6 A I don't know. I don't talk to Alber.

7 BY MR. ALVAREZ:

8 Q Did you talk to him in 2019?

9 A I don't remember.

10 Q Do you know Alejandro J Natareno Valdez?

11 A No.

12 Q Do you know if he worked for Purpose Point?

13 A I don't know.

14 Q Are you representing or wanting to represent Alejandro in this
15 lawsuit against Purpose Point and Milton and Lucille?

16 MR. O'HEARN: Object to the form.

17 A I don't talk to them.

18 BY MR. ALVAREZ:

19 Q Did you ever talk to Alejandro when you were working?

20 A I don't remember.

21 Q What about Bridman Uriver Gomez-Moreno. Do you know him?

22 A Yes, he knows them.

23 Q How do you know him?

24 A Because they are the ones also trying to put a suit against my
25 dad.

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1 Q Did Bridman work for Purpose Point?

2 A He is working for them.

3 Q He is working right now for Purpose Point?

4 A He is working for them, but I don't know if the company
5 Purpose Point, but I don't know if he is working right now.

6 Q So if Bridman is in Guatemala right now, is he still working
7 for Purpose Point that you know of?

8 A As far as I know he was still working for Purpose Point, but I
9 don't know. Maybe that is something that Purpose Point would
10 know.

11 Q So Bridman, do you know -- is he also related to you?

12 A Family -- my family regarding a sir names?

13 Q Yes.

14 A Yes.

15 Q What is he?

16 A He is like a distant family member.

17 Q He is like a second cousin, right?

18 A I think so.

19 Q Okay. Do you know if he worked in 2017?

20 A I don't know.

21 Q What about 2018?

22 A I don't know.

23 Q What about 2019?

24 A Yes.

25 Q Okay. In 2019 was he working with you on your crew?

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1 A No.

2 Q Okay. Did you work with him at all in 2019?

3 A What do you mean working? You mean together, I saw him
4 somewhere?

5 Q That's fair. In 2019 while working at Purpose Point did you
6 work in the same field as him?

7 A It was very rare for groups to work together. Beyond that, we
8 all work with each one with the ranchers.

9 Q So you and your crew worked usually by yourselves, not with
10 other groups?

11 A Sometimes the teams would meet together, say hey, you want to
12 work with that group. So we go there and help that group.

13 Q But typically you worked with your crew on a field separate
14 from everybody else?

15 A We all were invited.

16 Q Okay. In 2019 did you talk to Bridman?

17 A How are you? Take care.

18 Q Just saying hello?

19 A Yes.

20 Q Okay. So in this lawsuit are you representing or do you want
21 to represent Bridman in this lawsuit against Purpose Point,
22 Milton and Lucille?

23 MR. O'HEARN: Object to form.

24 A The ones who are suing Milton are the names you already have.
25

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1 BY MR. ALVAREZ:

2 Q Did you know that your attorneys filed a motion with the Court
3 asking the Judge to let you, your brother and Julio represent
4 all of these other workers against Milton, Purpose Point and
5 Lucille?

6 MR. O'HEARN: Object to form again.

7 A I didn't understand the question. Could you repeat that?

8 BY MR. ALVAREZ:

9 Q Your attorneys, filed what is called a motion, a petition,
10 asking the Judge to let you, Julio and Hervil represent all of
11 these other workers in this lawsuit against Purpose Point,
12 Milton and Lucille.

13 MR. O'HEARN: Objection to form again.

14 A I still don't understand.

15 BY MR. ALVAREZ:

16 Q Also for the record we will reserve all objections related to
17 form and relevance, so we don't have to keep interrupting.

18 So as far as you know, the only ones that are suing
19 in this lawsuit are yourself, Julio, your brother, Leonel,
20 Darwin and Artemio?

21 A As far as I know.

22 Q Okay. So Bridman, do you know if he has the same claims
23 against Purpose Point, Lucille and Milton that you do?

24 A I don't know.

25 Q What about Alejandro?

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1 A I don't know.

2 Q What about Alber?

3 A I don't know.

4 Q Let the record reflect the witness is tossing up his hands at
5 the same time as he is saying he doesn't know. What about --
6 sucks getting old. What about Benito Ronaldo Miranda Perez,
7 do you know that name?

8 A Yes.

9 Q Who is he?

10 A He probably came in 2017 to Michigan to work for Purpose
11 Point.

12 Q He was one of the, was it 14 workers that came in 2017?

13 A Yes.

14 Q Do you know if he worked in 2018?

15 A He used to work.

16 Q What about 2019?

17 A He used to work, yes.

18 Q Do you know if he has the same claims as you against Milton,
19 Lucille and Purpose Point?

20 A No one is going to have the guts to complain, just us.

21 Q Okay. That's fair. But my question is do you know if he has
22 something to complain about?

23 A I don't know. I don't know if he has a complaint or not.

24 Q Have you talked to him about whether he has a complaint?

25 A No.

1 Q What about Byron Danny Chilel, who is he?

2 A I think he also work or still working, but I don't know. But
3 I met -- I knew of him because he worked for Purpose Point.

4 Q So you worked with him at Purpose Point at some time?

5 A In 2017 when it was the 14 that came.

6 Q Did he work in 2018?

7 A Yes.

8 Q Did he work in 2019?

9 A Yes.

10 Q Did he work on your crew?

11 A I don't remember.

12 Q And Mr. Echeverria I have to ask this question. I'm going to
13 ask this question of everybody. I am not trying to be
14 repetitive, but I have to ask you for everybody, okay. So I
15 beg you for some patience.

16 For Byron, do you know if he has the same claims as
17 you do against Lucille, Purpose Point and Milton?

18 A I don't know. I don't know.

19 Q Carlos Enrique Perez Juarez, do you know him?

20 A No.

21 Q Do you know if he ever worked for Purpose Point.

22 A I don't know.

23 Q Do you know if he has the same claims against my clients as
24 you do?

25 A No one is going to have the guts to complain.

1 Q But my question is do you know personally whether Carlos has
2 the same claims that you do against my clients?

3 A I don't know.

4 Q What about Cesar Ruben Lopez Perez?

5 A I don't know if I know him, I don't know.

6 Q Okay. Do you know if he worked in 2017?

7 A No.

8 Q Well, he didn't work or you don't know?

9 A Didn't work.

10 Q Thank you. What about 2018 and 2019?

11 A 2018 I don't know. 2019 I saw him.

12 Q Did he work on your crew?

13 A No.

14 Q Do you know when he started working in 2019?

15 A I don't know.

16 Q Do you know when he stopped working in 2019?

17 A What do you mean when he stop? What do you mean with that?

18 Q That is a fair question. When you were working for Purpose
19 Point, you worked from a certain date until a certain date
20 every year.

21 A Repeat that.

22 Q That's fine. So let's start with 2019, because that is what
23 we are talking about for Cesar Lopez Perez.

24 A Cesar Lopez Perez.

25 Q So in 2019 when did you come to work at Purpose Point?

1 A In May. I don't remember very well the exact date.

2 Q That's fine, I am not going to hold you to the exact date.

3 But you came in may, right?

4 A As far as I can remember. It's been a long time.

5 Q I understand. Do you know when Cesar came to work at Purpose
6 Point in 2019?

7 A I don't know.

8 Q In 2019 at some point you stopped working for Purpose Point,
9 correct?

10 A Yes.

11 Q Do you know whether Cesar or do you know when Cesar stopped
12 working for Purpose Point in 2019?

13 A I don't know.

14 Q Okay. That's fine. Do you know if Cesar has the same claims
15 against my clients that you do?

16 A I don't know.

17 Q Have you talked to Cesar about this lawsuit?

18 A No.

19 Q What about Cristian Santiago Felix-Bamaca. Do you know him?

20 A Yes.

21 Q How do you know him?

22 A He is a family member of Milton's niece.

23 Q Did he work at Purpose Point?

24 A Yes.

25 Q Do you remember what years he worked at Purpose Point?

1 A I don't know, no. I don't know exactly.

2 Q Have you talked to Cristian about this lawsuit?

3 A No.

4 Q Did Cristian ever work on your crew?

5 A No.

6 Q Do you know if Cristian has the same claims against my clients

7 that you do?

8 A I don't know.

9 Q What about Cupertino Lopez Moreno. Do you know him?

10 A Yes.

11 Q How do you know him?

12 A It is a family member of ours.

13 Q Do you know whether he worked at Purpose Point?

14 A Yes.

15 Q Do you know what years he worked at Purpose Point?

16 A I don't know exactly the years.

17 Q Okay. Did he work on your crew that you know of?

18 A No.

19 Q Do you know whether Cupertino has the same claims against my

20 clients that you do?

21 A I don't know exactly.

22 Q Have you talked to him about this lawsuit?

23 A No.

24 Q What about Dagoberto Garcia-Perez, do you know him?

25 A Yes.

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1 Q How do you know him?

2 A He was one of the first 14 that came in 2017.

3 Q Okay. Do you know if he worked in 2018 or 2019?

4 A Yes, he did work.

5 Q Did he work on your crew?

6 A In 2017 I don't remember, but I think he worked with us.

7 Q So did he work in 2017 or did he not work in 2017?

8 A He didn't work. You asked if he worked in my crew, he did not

9 work in my crew.

10 Q Thank you for clarifying. But in 2018 and 2019 that you

11 remember, did he work on your crew?

12 A I don't remember exactly.

13 Q Do you know when he started working in 2019, the month, the

14 day?

15 A I do not, because Milton sent to Michigan different days

16 different groups.

17 Q Do you know when he stopped working in 2019?

18 A I don't know.

19 Q What about 2018, do you know when he started and when he

20 stopped working in 2018?

21 A I don't know exactly.

22 Q Do you know if Dagoberto has the same claims as you against my

23 clients?

24 A He is not going to be willing to talk.

25 Q But my question was, do you know personally whether he has the

1 same claims that you do against my clients?

2 A I don't know.

3 Q Have you talked to him about this lawsuit?

4 A No.

5 Q What about David Alex Gomez-Perez, do you know him?

6 A David Alex?

7 Q Gomez-Perez.

8 A At Purpose Point there were many Davids, so I don't know if I
9 have a picture of that.

10 Q What other Davids do you remember?

11 A There was another David, but I don't know where he was from.

12 Q This other David, was he also a Purpose Point worker?

13 A Yes.

14 Q I ask because I have the list of the workers from Purpose
15 Point for those years and I don't see another David.

16 A I remember a David that worked in a group in 2018, but Milton
17 left him in Guatemala.

18 Q Okay. But David Alex Gomez-Perez you don't remember him?

19 A I don't remember him.

20 Q So I assume you haven't talked to him about this lawsuit then?

21 A No.

22 Q And you don't know whether he has the same claims that you do
23 against my client?

24 A I don't know.

25 Q What about Deibin Belarmino Gomez-Zacarias, do you know him?

1 A Yes.

2 Q How do you know, is it Deibin?

3 A It is a family member of ours.

4 Q Okay. And he worked with Purpose Point?

5 A Yes. Milton left him for a year I think.

6 Q Do you know what years Deibin worked for Purpose Point?

7 A It was in 2018.

8 Q Do you remember when he started working in 2018?

9 A I don't know exactly.

10 Q Do you know when he stopped working in 2018?

11 A I don't know.

12 Q Do you know how many days a week he worked?

13 A He was working in a group.

14 Q Okay. So in 2018 he was in your group, so whatever hours your
15 group worked, he would have worked with you?

16 A 2019 you said --

17 Q 2018.

18 A From Guatemala to Michigan, the groups they didn't come all
19 together you understand.

20 Q Yeah. They sent them staggered, right. So a group would go
21 one week, another group would go another week or a different
22 day, correct?

23 A Exactly.

24 Q That's fine. But when he was here in 2018 and he was working
25 on your crew, the hours that your crew worked were the hours

1 that he worked?

2 A Yes.

3 Q Do you know if he has the same claims against my clients that
4 you do?

5 A He is afraid of Milton.

6 Q But my question is, do you know personally whether he has the
7 same claims against my clients that you do in this lawsuit?

8 A I don't know.

9 Q Have you talked to him about this lawsuit?

10 A No.

11 Q Okay. Do you know if he worked in 2019?

12 A He did work.

13 Q Did he work on your crew?

14 A Yes.

15 Q Okay. And you don't know when he started or when he stopped
16 working in 2019, correct?

17 A I don't remember exactly.

18 Q Okay. What about Eder Waldemar Echeverria-Arriaga?

19 A Eder Waldemar Echeverria-Arriaga?

20 Q Do you know him?

21 A Yes.

22 Q How do you know him?

23 A He also lived there with us. He also sue my dad and he also
24 came in 2017.

25 Q Do you know if he worked in 2018 or 2019?

1 A He did work.

2 Q Did he work on your crew?

3 A No.

4 Q In any of those years that he worked, do you know when he
5 started working and when he stopped working?

6 A I don't know exactly.

7 Q Do you know in 2017 what days he worked?

8 A What year?

9 Q 2017.

10 A I don't know.

11 Q What about 2018?

12 A I don't know exactly.

13 Q What about 2019?

14 A I don't know exactly.

15 Q Do you know -- well, have you talked to Eder about this
16 lawsuit?

17 A No.

18 Q Do you know whether he has the same claims that you do against
19 my clients?

20 A I don't know.

21 Q What about Edy Cruz Dionicio Barrios. Do you know him?

22 A I don't know exactly. I don't remember.

23 Q Do you know if he worked in 2017, 2018 or 2019 for Purpose
24 Point?

25 A I don't know. I don't know exactly. I don't know.

1 Q I assume he didn't work on your crew in any of those years?

2 A No.

3 Q So you wouldn't know how many days he worked in any week or
4 how many hours he worked any day in those years?

5 A I don't know.

6 Q Have you talked to him about this lawsuit?

7 A No.

8 Q And do you know whether he has the same claims that you do
9 against my clients?

10 A I don't know.

11 Q Elfego Rosinel Lopez-Guzman. Do you know him?

12 A I don't know exactly.

13 Q Do you know if he worked for Purpose Point?

14 A I don't know exactly.

15 Q So I assume you haven't talked to him about this lawsuit?

16 A I don't know who he is. I don't have a picture to say if I
17 know him.

18 Q Okay. Do you know if he has the same claims against my
19 clients that you do?

20 A I don't know exactly.

21 Q What about Elvis Eudelio Lopez-Orozco, do you know him?

22 A Elvis Eudelio Lopez-Orozco, yes.

23 Q How do you know him?

24 A In Guatemala he lived like 15 minutes away from where I live.

25 Q In Guatemala, okay. Do you know if he worked for Purpose

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1 Point?

2 A He did work.

3 Q Do you know what years he worked?

4 A I don't know exactly, no, I don't.

5 Q I assume he didn't work on your crew?

6 A No.

7 Q So you wouldn't know when he started working in any of the
8 years that he worked and when he stopped working and any of
9 the years that he worked?

10 A Not exactly, no.

11 Q Would you happen to know how many days a week he would work or
12 how many hours a day he would work?

13 A I don't know.

14 Q Have you talked to him about this lawsuit?

15 A No.

16 Q Do you know if he has the same claims against my clients that
17 you do?

18 A I don't know.

19 Q What about Erasmo Alexander Ramirez, do you know him?

20 A I don't know.

21 Q You don't know if he worked for Purpose Point?

22 A No, I don't know if he did work.

23 Q Have you talked to him about this lawsuit?

24 A No.

25 Q Do you know if he has the same claims against my client that

1 you do?

2 A I don't know.

3 Q Who about Ergil Miguel Gomez Navarro, do you know him?

4 A Yes.

5 Q How do you know him?

6 A He worked in my group.

7 Q What year?

8 A I don't remember exactly the year.

9 Q So you don't know which years he worked?

10 A All I know is he started working in 2018.

11 Q Okay. Do you know when in 2018 or 2019 when he started
12 working and when he stopped working?

13 A 2018.

14 Q And 2019. Do you know when he started and stopped each year?

15 A I don't remember exactly.

16 Q Do you happen to know how many days a week he worked in any
17 week in those years?

18 A Who -- he was working with me for a while, but I don't
19 remember what season.

20 Q So whatever hours your crew worked, if he was on your crew,
21 those are the hours he worked too?

22 A I don't remember. He worked, but I don't know the hours that
23 he worked.

24 Q That's fair. So if we have your time sheets, your crew hours,
25 if we know what hours you and your crew worked and he was a

1 part of your crew, then those are the hours that he would have
2 worked, right?

3 A Can I say something?

4 Q Well, answer the question first.

5 A When he started working with me, yes. But before that, I
6 don't know.

7 Q That's fair. Have you talked to him about this lawsuit?

8 A No.

9 Q Do you know if he has the same claims against my clients that
10 you do?

11 A He wouldn't be willing to talk.

12 Q That is not my question. My question is, do you know whether
13 he has the same claims against my clients that you do?

14 A I don't know.

15 Q What about Ervin Danilo De Leon Lopez, do you know him?

16 A Yes.

17 Q And how do you know him?

18 A I think he came in 2018 I believe.

19 Q Do you know if he worked any other year?

20 A 2019 also.

21 Q Okay. Did he work on your crew in any of those years?

22 A Yes.

23 Q Which year?

24 A I don't remember exactly.

25 Q Okay. And so, same question for him, the hours that your crew

1 worked would be the same hours that he worked when he was on
2 your crew?

3 A Mr. lawyer, we used to work from 2:00 a.m. to 2:00 p.m. but
4 the question you are asking, Milton used to work with those in
5 the computer at his office. So I don't know at one point to
6 be specific.

7 Q But my question was whatever hours you and your crew worked
8 are the same hours that he would have worked, correct?

9 A I don't know exactly.

10 Q Well, when you worked as a crew, did you ever leave someone
11 behind or did you all go work together?

12 A Sometimes we worked together, but sometimes Milton took one
13 person from the group sometimes.

14 Q Okay. But did that happen every day?

15 A Not every day, sometimes once a week.

16 Q Okay. So in general, the hours that your crew worked, if
17 Ervin was working with your crew and not off doing something
18 else, he worked the same hours as you and your crew?

19 A Yes.

20 Q Okay. Have you talked to Ervin about this lawsuit?

21 A No.

22 Q Do you know personally if Ervin has the same claims against my
23 clients that you do?

24 A I didn't talk to Ervin because he will tell Milton.

25 Q So you didn't want to tell him something that would get back

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1 to Milton?

2 A I'm sorry, I am not understanding. Sometimes some people go,
3 hey, Milton this is what happened.

4 Q So you are saying they would like go and snitch?

5 A Just trying to be on the good side.

6 Q Question for the translator. I think the terminology that
7 would fit here would be galeona. But I am not sure how that
8 translates to English.

9 A I think what he is trying to say is -- I don't know how to say
10 this exactly.

11 Q I think snitch would be the closest version to that I think,
12 right?

13 A Tattle tale, yes.

14 Q Okay. So use that word.

15 A Okay.

16 Q For tattle tale and snitch. So what you are saying is that
17 you wouldn't talk to Ervin because you felt that he was a
18 tattle tale?

19 A I don't know.

20 Q Okay. That's fine. So do you know whether he had the same
21 claims against my client as you do?

22 A They will not be willing to do the complaint.

23 Q And that is fine. My question is do you know personally
24 whether he has the same claims against my client that you do?

25 A I don't know.

1 Q Okay. You haven't talked to him about this lawsuit I am
2 assuming?
3 A No.
4 Q What about Esuardo -- no, Esuardo Rene Rivera-Barrios, do you
5 know him?
6 A I don't know.
7 Q Do you know if he's ever worked at Purpose Point?
8 A I don't know.
9 Q Have you talked to him about this lawsuit?
10 A No.
11 Q Do you know if he has the same claims against my clients that
12 you do?
13 A I don't know.
14 Q What about Esvin B. Sandoval Mateo?
15 A I don't know.
16 Q Do you know if he ever worked for Purpose Point?
17 A I don't know.
18 Q Have you talked to him about this lawsuit?
19 A I don't know who he is.
20 Q Okay. So do you know whether -- do you know personally
21 whether he has the same claims against my clients that you do?
22 A I don't know him.
23 Q What about Eugenio Perez-Pablo, do you know him?
24 A Yes.
25 Q How do you know him?

1 A He worked at Purpose Point or he is still working, I don't
2 know in reality.

3 Q Do you know what years he worked for Purpose Point?

4 A No, I don't know.

5 Q Have you talked to him about this lawsuit?

6 A No.

7 Q Okay. Do you know whether he has the same claims against my
8 clients that you're bringing in this lawsuit?

9 A I don't know.

10 Q What about Favio Moreno Trabanino, do you know him?

11 A Yes.

12 Q How do you know him?

13 A He traveled with me in 2017.

14 Q Isn't he also a cousin of yours?

15 A Distant.

16 Q He is also a cousin too, right?

17 A Yes.

18 Q And Deibin as well?

19 A Deibin.

20 Q Deibin Blearmino Gomez-Zacarias.

21 A Yes.

22 Q So Favio I know you said he worked in 2017.

23 A Yes.

24 Q Did he work in 2018 or 2019?

25 A I remember there was a year where Milton left him in

Guatemala.

Q Do you know when in 2017 and 2018 he started and stopped working?

A '17 and '18 you said, right?

Q '17 and '18.

A No, I don't know.

Q What about 2019?

A I don't know.

Q Have you talked to him about this lawsuit?

A No.

Q And do you know personally whether he has the same claims against my clients that you are bringing in this lawsuit?

A I don't know.

Q Feliciano Adrian Lopez-Ramos, do you know him?

A I don't know.

Q Okay. Do you know if he ever worked for Purpose Point?

A I don't know.

Q Have you talked to him about this lawsuit?

A I don't know him.

Q Okay. Do you know personally whether Feliciano has the same claims against my clients that you're bringing in this lawsuit?

A I don't know him.

Q What about Franklin Romario Ramirez-Lopez. Do you know him?

A Yes.

1 Q And how do you know him?

2 A I don't know if he did work or he is still working at Purpose
3 Point.

4 Q Did you ever work with him?

5 A Yes. And sometimes we used to go ahead with other groups.

6 Q And have you talked to him about this lawsuit?

7 A No.

8 Q Okay. Do you know whether he has the same claims against my
9 clients that you're bringing in this lawsuit?

10 A All I know is that Milton let him for a year but then that's
11 it.

12 Q What about Fredy Yovani Fuentes Osorio?

13 A I don't know.

14 Q Do you know if I worked for Purpose Point?

15 A I don't know.

16 Q Have you talked to him about this lawsuit?

17 A No.

18 Q Do you know whether he has the same claims against my clients
19 that you're bringing against them in this lawsuit?

20 A I don't know.

21 Q What about Guillermo Augusto Orozco-Orozco?

22 A I don't know him.

23 Q Do you know if he ever worked for Purpose Point?

24 A I don't know.

25 Q Have you talked to him about this lawsuit?

1 A I don't know him.

2 Q Do you know personally whether he has the same claims against
3 my clients that you're bringing in this lawsuit against them?

4 A I don't know.

5 Q What about is Isael Hernandez Hernandez. Do you know him?

6 A I don't know.

7 Q Do you know if he ever worked for Purpose Point?

8 A I don't know.

9 Q Have you ever talked to him about this lawsuit?

10 A I don't know him.

11 Q Do you know personally whether Isael has any of the same
12 claims against my client that you're bringing in this lawsuit?

13 A I don't know.

14 Q What about Jesus Enrique Garcia-Gomez. Do you know him?

15 A Yes.

16 Q How do you know him?

17 A In Guatemala he lives close by us.

18 Q Did he ever work for Purpose Point?

19 A Yes.

20 Q Do you know when he worked?

21 A I don't know.

22 Q Did he ever work on your crew?

23 A No.

24 Q Have you talked to him about this lawsuit?

25 A No.

1 Q Do you know personally if he has the same claims against my
2 clients that you're bringing in this lawsuit against them?

3 A I don't know.

4 Q What about Jezer Jeudi Bonilla-Barrios?

5 A Jezer.

6 Q Jezer. Do you know him?

7 A I know him.

8 Q How do you know him?

9 A He is a family member on my mom's side.

10 Q And did he work for Purpose Point?

11 A Yes.

12 Q Do you know when he worked for Purpose Point?

13 A I don't know.

14 Q Did he ever work on your crew?

15 A No.

16 Q Have you talked to him about this lawsuit?

17 A No.

18 Q Do you know personally whether he has the same claims against
19 my clients that you do?

20 A I don't know.

21 Q Jose Benigno Romero-Felipe. Do you know him?

22 A I don't know.

23 Q Do you know if he ever worked for Purpose Point?

24 A I don't know.

25 Q Have you talked to him about this lawsuit?

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1 A No.

2 Q Do you know personally if he has the same claims against my
3 clients that you're bringing in this lawsuit against them?

4 A I don't know.

5 Q What about Jose Manuel Cabrera Gutierrez, do you know him?

6 A No.

7 Q Do you know if he ever worked for Purpose Point?

8 A I don't know.

9 Q Have you talked to him about this lawsuit?

10 A No.

11 Q Do you know personally whether he has the same claims against
12 my clients that you're bringing in this lawsuit against them?

13 A I don't know.

14 Q Juan Alberto Osorio Antonio. Do you know him?

15 A Can you repeat the name?

16 Q Sure. Jose Alberto Osorio Antonio.

17 A No.

18 Q Do you know if he ever worked for Purpose Point?

19 A I don't know.

20 Q Have you ever talked to him about this lawsuit?

21 A No.

22 Q Do you know if he has the same claims against my clients that
23 you're bringing against them in this lawsuit?

24 A I don't know.

25 Q What about Juan Valentin Gomez y Gomez?

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1 A I know him.
2 Q Isn't he a cousin?
3 A Yes, it is a cousin of ours.
4 Q And do you know if he ever worked at Purpose Point?
5 A Yes.
6 Q Do you know when he worked at Purpose Point?
7 A Not exactly.
8 Q Did he ever work on your crew?
9 A No.
10 Q Have you talked to him about this lawsuit?
11 A No.
12 Q Do you know personally whether he has the same claims against
13 my client you have brought against them in this lawsuit?
14 A I don't know.
15 Q Okay. Kenny Orlando Moreno Gomez?
16 A I know him.
17 Q How do you know him?
18 A A cousin of ours.
19 Q Do you know if he worked for Purpose Point?
20 A Yes.
21 Q Do you know what years he worked for Purpose Point?
22 A I don't know exactly.
23 Q He didn't work on your crew?
24 A No.
25 Q Have you talked to him about this lawsuit?

1 A No.

2 Q Do you know personally whether he has the same claims against
3 my client that you are bringing against them in this lawsuit?

4 A I don't know.

5 Q What about Leonardo Antonio Merino-Gomez. Do you know him?

6 A I don't know.

7 Q Do you know if he ever worked for Purpose Point?

8 A I don't know.

9 Q Have you talked to him about this lawsuit?

10 A No.

11 Q Do you know whether -- do you know personally whether he has
12 the same claims against my clients that you're bringing
13 against them in this lawsuit?

14 A I don't know.

15 Q What about Lesvy M Lopez Ramirez.

16 A I don't know.

17 Q Isn't he a cousin of yours?

18 A If you show me a picture I can tell you if I know him. You
19 can show me a picture.

20 Q So Lesvy, did he ever work on your crew that you know of?

21 A I don't know.

22 Q Do you know if he ever worked for Purpose Point?

23 A I don't know.

24 Q Have you talked to him about this lawsuit?

25 A No.

1 Q Do you know personally if Lesvy has the same claims against my
2 clients that you're bringing against them in this lawsuit?

3 A I don't know.

4 Q What about Mario Adolfo Moreno?

5 A Yes.

6 Q How do you know him?

7 A It is a family member of Milton and I.

8 Q Do you know if he worked at Purpose Point?

9 A Yes.

10 Q And do you know what years he worked for Purpose Point?

11 A 2017.

12 Q Just 2017?

13 A And on.

14 Q So he worked in 2018 and 2019?

15 A Yes.

16 Q Did he work on your crew?

17 A I don't know.

18 Q Okay. When he was working at Purpose Point those three years,
19 do you know when he started working and when he stopped
20 working in any of those years?

21 A I don't know.

22 Q Have you talked to him about this lawsuit?

23 A No.

24 Q Do you know whether he has the same claims against my clients
25 that you're bringing against them in this lawsuit?

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- 1 A I don't know.
- 2 Q What about Mefibocet Morale De Paz, do you know him?
- 3 A Yes.
- 4 Q How do you know him?
- 5 A He is -- he traveled in 2017.
- 6 Q Did he work in any other years?
- 7 A As far as I know Milton left him for a year.
- 8 Q So do you know if he worked in 2018 and 2019?
- 9 A Yes.
- 10 Q Did he work on your crew?
- 11 A Yes.
- 12 Q Have you talked to him about this lawsuit?
- 13 A Only asked why he stay.
- 14 Q When was this?
- 15 A I don't know exactly to tell you the truth.
- 16 Q Did you call him or did he call you?
- 17 A I spoke with him.
- 18 Q You called him from your phone?
- 19 A Yee.
- 20 Q Was anyone else with you?
- 21 A No.
- 22 Q Do you know that he is claiming that he spoke to you and to
- 23 Teresa Hendricks from your attorney's office?
- 24 A Spoke with him how?
- 25 Q Over the phone?

1 A He spoke with Teresa and with me at the same time or how?

2 Q He said that you called him and then you passed the phone to

3 Teresa to talk to him.

4 A That's a lie.

5 Q So that never happened?

6 A I spoke to him, yes. I spoke to him said hey, Milton, why you

7 stay? He said the boss left me. Gave 2500 to left Michigan.

8 What happened there. He said he left me anyways.

9 Q But when he says that you passed the phone then to Teresa

10 Hendricks from your attorney's office, that is not true?

11 A Just saying that I was talking to him and I passed the phone

12 to Teresa that is what you are saying?

13 Q That is what he says.

14 A That is a lie.

15 Q So there was never a time when you talked to Mefi and Teresa

16 was with you?

17 A That is a lie. It didn't happen.

18 Q So as far as you know, Mefi did not speak to Teresa Hendricks?

19 A What they start telling there is what I know is yes, he did.

20 He spoke with Teresa. But it's a lie, I wasn't here and

21 Teresa wasn't there and that I pass the phone, that is not

22 true.

23 Q But you are confirming that Teresa did talk to Mefi then?

24 A You are saying that I passed the phone to Teresa to speak with

25 Mefi.

1 Q That scenario didn't happen?

2 A No, not the way you are saying, no.

3 Q But you do know that Mefi did speak to Teresa Hendricks?

4 A I know he spoke with Teresa.

5 Q How do you know that he spoke to Teresa?

6 A Because when he was drinking he said oh, dear, I spoke with
7 Teresa.

8 Q So in Guatemala?

9 A Yes.

10 Q When did Mefi talk to Teresa? What year?

11 A I don't remember.

12 Q When did you first talk to Teresa? Just asking for dates,
13 logistics. I don't want to know what you talked about, I just
14 want to know the date that you talked to her if you remember.

15 A The date I couldn't tell you, but I can remember it was around
16 2018.

17 Q 2018?

18 A Other than that I don't remember.

19 Q So 2018 or 2019?

20 A I don't remember exactly.

21 Q Do you remember around what time of year it was?

22 A I don't remember.

23 Q Okay. And then you found out that Mefi spoke to Teresa when
24 you were back in Guatemala and you ran into him?

25 A No.

1 Q No. Can you explain when? I thought you said you ran into
2 him and he had been drinking in Guatemala and he told you that
3 he had spoken to Teresa.

4 A I never said I met him with Mefi. I said Mefi when he was
5 drunk there in Guatemala, he said he spoke with Teresa.

6 Q Okay. And who did he tell?

7 A He was among a group drinking and that is when he said that.

8 Q And you weren't there?

9 A I was here in the U.S.

10 Q That is what I thought. I wanted to clear that up because it
11 sounded like you said you met him while he was drinking in
12 Guatemala.

13 A I said Mefi was talking when he was drunk. I didn't say I saw
14 him.

15 Q So then you heard about him saying that from someone else?

16 A Yes.

17 Q Who?

18 A My mother was one who told me when he was drunk at the
19 cantina, that is when he say that.

20 Q So aside from Mefi saying that he talked with Teresa, do you
21 have any personal knowledge of him having spoken to Teresa?

22 A I don't know. I don't know exactly. I don't know.

23 Q Well, I mean do you know or do you not know?

24 A All I know is that Teresa spoke with Mefi.

25 Q So Teresa did speak to Mefi?

1 A Teresa spoke with Mefi.

2 Q How do you know that Teresa spoke to Mefi?

3 A First Mefi, he was drunk there in Guatemala. He start
4 talking. And then Mefi told that Teresa spoke with Mefi. And
5 that is all I knew is that he spoke with Theresa.

6 Q So you don't know whether he did speak to Teresa, you know
7 that he says that he spoke with Teresa, correct?

8 A Mefi said that he spoke with Teresa. But then time went by
9 and then Teresa confirmed that he spoke with Mefi if you ask
10 her.

11 Q All right. So Teresa confirmed to you that she spoke with
12 Mefi?

13 A Yes, because I talked to her after I learned that and she said
14 yes.

15 Q Do you know if Teresa spoke to anybody else?

16 MR. O'HEARN: I am going to object on the basis of
17 attorney/client privilege.

18 MR. ALVAREZ: He already told us about Mefi.

19 MR. O'HEARN: Well, I'm going to stop it here.

20 BY MR. ALVAREZ:

21 Q Has anyone else told you that Teresa has spoken to any of the
22 other workers?

23 A No.

24 Q Okay. So as far as you know, Mefi is the only one that Teresa
25 has spoken to of the workers?

1 A I don't understand the question.

2 Q Aside from Mefi, because we know that Teresa talked to Mefi,
3 but do you know if Teresa talked to anybody else that are the
4 workers of Purpose Point?

5 A Cupertino, I don't remember the last name.

6 Q Cupertino Lopez Morena.

7 A I think so, yes.

8 Q Okay. Anybody else?

9 A He was in the lawsuit.

10 Q He was.

11 A I don't know who they are, but as far as I know Milton spoke
12 to Cupertino when they were down there in Guatemala. He said
13 hey, cousin, I'm going to bring you there.

14 Q You said Cupertino was in the lawsuit?

15 A Cupertino, no. As far as I know I think Milton was afraid
16 Cupertino that was going to sue him because he left him there.

17 Q But Cupertino wasn't in this lawsuit, right?

18 A I don't know exactly.

19 Q But you know that Cupertino did speak to Teresa?

20 MR. O'HEARN: Object. You don't need to answer
21 anything about what you told Teresa.

22 A Okay.

23 BY MR. ALVAREZ:

24 Q So aside from Cupertino and Mefibocet do you know of anybody
25 else who has spoken to Teresa?

1 A If he spoke with Alber and Antonio.

2 Q Those two. Anybody else?

3 A I don't know.

4 Q Mefibocet, do you know if he has the same claims against my
5 clients that you're bringing against them in this lawsuit?

6 A I don't know.

7 Q What about Melvin Hemitalio Mendez-Fuentes, do you know him?

8 A Yes.

9 Q How do you know him?

10 A He is the husband of one of my cousins.

11 Q Okay. Do you know if he ever worked for Purpose Point?

12 A Yes.

13 Q When?

14 A I don't know exactly.

15 Q Did he ever work on your crew?

16 A I remember it was for one harvest, but I don't remember what
17 kind of vegetable or what a food that was.

18 Q Have you talked to him about this lawsuit?

19 A No.

20 Q Do you know if he has the same claims against my client that
21 you're bringing against them in this lawsuit?

22 A I don't know.

23 Q What about Oliver Rikelvin Ramirez?

24 A I don't know.

25 Q Do you know if he worked for Purpose Point?

1 A I don't know.

2 Q I assume you have never talked to him about this lawsuit?

3 A No.

4 Q So you don't know whether he has the same claims against my
5 clients that you're bringing against them in this lawsuit?

6 A I don't know.

7 Q What about owe Omar Sanvel Ramirez Carrillo. Do you know him?

8 A I don't know.

9 Q Do you know if he ever worked for Purpose Point?

10 A I don't know.

11 Q Have you ever talked to him about this lawsuit?

12 A No.

13 Q Do you know if he has the same claims against my clients that
14 you're bringing against them in this lawsuit?

15 A I don't know.

16 Q What about Oscar Gerardo Gomez-Lopez, do you know him?

17 A I don't know.

18 Q Isn't he a cousin of yours?

19 A If there is a picture that I can see?

20 Q Do you know if he worked with you at Purpose Point?

21 A I don't know.

22 Q Have you talked to him about this lawsuit?

23 A No.

24 Q And do you know whether I has the same claims against my
25 clients that you're bringing against them in this lawsuit?

1 A I don't know.

2 Q Okay. Pablo Cruz Perez Solis?

3 A I know him.

4 Q How do you know him?

5 A He used to work or still works at Purpose Point.

6 Q Okay. Do you know what years he worked?

7 A I don't remember.

8 Q Did he work on your crew?

9 A No.

10 Q Have you talked to him about this lawsuit?

11 A No.

12 Q And do you know whether he has the same claims against my
13 clients that you're bringing against them in this lawsuit?

14 A I don't know.

15 Q Patricio Adrian Merida-Avila.

16 A I know him.

17 Q How do you know him?

18 A He worked for Purpose Point.

19 Q Do you know when he worked for Purpose Point?

20 A I don't remember.

21 Q Did he work on your crew?

22 A No.

23 Q Have you talked to him about this lawsuit?

24 A No.

25 Q Do you know if he has the same claims against my clients that

1 you're bringing against them in this lawsuit?

2 A I don't know.

3 Q Raul Navarro Moreno, do you know him?

4 A No, I don't know him.

5 Q Do you know if he ever worked for Purpose Point?

6 A I don't know.

7 Q I assume he didn't work on your crew?

8 A I don't know him.

9 Q Have you talked to him about this lawsuit?

10 A I don't know him.

11 Q Do you know personally whether he has the same claims against
12 my client that you're bringing against them in this lawsuit?

13 A I don't know.

14 Q What about Ricardo Morena Gomez, do you know him?

15 A Yes, I know him.

16 Q How do you know him?

17 A He start probably in 2017.

18 Q Is he related to you?

19 A Yes.

20 Q Do you know what years he worked?

21 A Start in 2017, but he pass away.

22 Q Before he passed away had you talked to him about this
23 lawsuit?

24 A No.

25 Q Do you know whether he had the same claims against my clients

1 that you're bringing against them in this lawsuit?

2 A Mr. lawyer he pass away already.

3 Q I understand.

4 A How can I answer that? He is dead already.

5 Q Well, because in this case your attorneys are asking the Court
6 to let you represent the claims of all of these workers. That
7 is why I am asking you this question about every worker.

8 A I don't know.

9 Q Okay. Aside from the individuals that are suing right now,
10 Julio, Hervil, Artemio, Darwin and Leonel, do you know of any
11 other Purpose Point worker that has the same claims against my
12 clients that you are suing them for?

13 A I don't know.

14 Q Aside from those five that are with you in this lawsuit right
15 now and the ones that we have already talked about, have you
16 talked to any of the other workers of Purpose Point about this
17 lawsuit?

18 A Including Julio?

19 Q Yes.

20 A Nobody else.

21 Q Okay. Do you want to represent everybody else in this
22 lawsuit?

23 A What do you mean to represent?

24 Q Well, so your attorneys have asked the Court to let you
25 represent them, all of the other workers in this lawsuit. And

1 so I am asking you is that something that you want, because
2 you told me that you don't know of any other worker that has
3 the same claims that you do, and you haven't talked to any of
4 them about this lawsuit.

5 A Do you think they are going to have the courage to say hey, we
6 used to wake up at 2:00 a.m. and we finish at 10:00 p.m. and
7 Milton is not paying what is fair.

8 Q But that is why I am asking you, do you want to represent them
9 in this lawsuit?

10 A I don't know exactly. I don't understand -- I don't
11 understand what you are asking.

12 Q Neil, can you pull ECF 93, please?

13 (Exhibit 3 was marked)

14 Q Showing you what's been marked as Exhibit 3. Now I know that
15 it is in English so what I am going to have the interpreter at
16 least read you the title of this document, okay.

17 A Plaintiff Memorandum in Support of Their Motion For Class
18 Certification.

19 Q Read that in Spanish, please.

20 Have you seen that document before?

21 A No.

22 Q Has anyone ever read that -- something similar to you in
23 Spanish?

24 A Everything is in English.

25 Q That title though, have you heard that title before? Do you

1 recognize it?

2 A No.

3 Q I am going to instruct the interpreter to read this last line
4 on page one.

5 A All right.

6 Q That is the group of workers that your attorneys have asked
7 the Court to allow you to represent in this lawsuit. Do you
8 understand that?

9 A Yes, a little bit.

10 Q What does that mean to you?

11 A First of all, Mr. lawyer should have given this sheet in
12 Spanish because I don't know English. I cannot give you an
13 answer because it is in English.

14 Q I agree with you. I understand. But I need you to understand
15 that that is not my paper. That document was created by your
16 attorneys. That document was filed in the Court on your
17 behalf. Did you get a copy of this in Spanish?

18 MR. O'HEARN: Object. It is calling for
19 attorney/client communications.

20 MR. ALVAREZ: He's opened the door by saying he
21 hasn't received that document in Spanish.

22 A I said you did not give it to me. Everything has to be
23 arranged between you and the lawyers. Right now you're giving
24 me a piece of paper in English, not in Spanish.

25

1 BY MR. ALVAREZ:

2 Q That is the official document that was filed with the Court.

3 So I am asking you have you seen this document in Spanish?

4 A This needs to be fixed between you and him. This needs to be
5 in Spanish if you want me to read this.

6 Q That's not how it works, but let's ask.

7 MR. O'HEARN: I need to put on the record my meeting
8 with our communications with our client is between us and the
9 client.

10 MR. ALVAREZ: I want to put it on the record. Is
11 there a Spanish version of this document that we can show the
12 witness?

13 MR. O'HEARN: We don't have one with us now.

14 MR. ALVAREZ: Does one exist right now?

15 MR. O'HEARN: I don't think so.

16 BY MR. ALVAREZ:

17 Q So your attorney has confirmed that there is no Spanish
18 version of this document that you would have been able to
19 read. Do you understand that?

20 A Do you want me to present that to me in Spanish? This needs
21 to be fixed between you and the lawyers.

22 Q Well, I'm sorry you feel that way, but that is not how it
23 works. But that's okay. I need to understand whether you
24 understand what it means when your attorneys are asking the
25 Court to have you represent all of those workers?

1 A I still don't understand you. I don't know what conclusion
2 you have.

3 Q I have been asking you about all of these workers and I've got
4 about another 30 some workers to ask you about. I have asked
5 you whether you know whether they have the same claims against
6 my clients as you're bringing in this lawsuit. The reason
7 that I am asking you that question is because your attorneys
8 have filed that document telling the Court that you want to
9 represent all of these workers against my clients because they
10 have the same claims as you. Do you understand that?

11 A None of them would have the courage to tell the truth. If you
12 tell me that I have to go to Court in front of the Judge to
13 tell the truth, I will.

14 Q That's great, but that is not my question. My question is do
15 you understand what your attorneys have asked the Court to do?

16 A I don't understand what you are trying to tell me.

17 MR. O'HEARN: I want to put on the record I think
18 you are asking him to describe a legal process.

19 BY MR. ALVAREZ:

20 Q I am asking his understanding of it. That's fine, your
21 objection is noted, but I am asking his understanding. So we
22 have gone through this, I have asked you all of the workers --

23 A I am going to ask him if he can understand to make sure.

24 Q Okay.

25 A I asked him if he can understand it because my job is for him

1 to understand, I am an interpreter. I know he is from
2 Guatemala. I have been in Guatemala. I understand him
3 completely. I want to make sure it is not me. He keeps
4 saying he doesn't understand, so I want to make sure he
5 understands the words I am telling him. He is saying yes, but
6 sometimes he says he doesn't understand what the paper
7 entails.

8 BY MR. ALVAREZ:

9 Q I don't know how much simpler to make it. In this lawsuit you
10 and the other five are suing my clients, right? Yes?

11 A Yes.

12 Q Do you want to sue on behalf of everybody else too?

13 A On behalf of everybody else?

14 Q Do you want to sue on just your behalf or do you want to sue
15 on behalf of everybody?

16 A On behalf of everybody that you put over there.

17 Q All of the workers that worked in 2018 and 2019?

18 A And all of them are the ones who worked in 2018 and 2019.

19 Q Yes?

20 A How many people are there?

21 Q There is like 66 I think.

22 A You know how many people Milton brought in 2017, 2018 and
23 2019.

24 Q Yes, as do your attorneys. That is where we got the list
25 from.

1 A In that list in those questions that you asked me one of the
2 names in the list I don't know if I understood that one of the
3 names that were in the list.

4 Q What name?

5 A One of Milton's family member.

6 Q Well, okay. My question was do you want to sue my clients on
7 your behalf and on behalf of all of these other workers? The
8 ones that you have told me you haven't talked to about this
9 lawsuit, the ones that you have told me you don't know whether
10 they have the same claims against my clients or not. Do you
11 want to sue my clients on their behalf?

12 A How to explain this to you. I'm sorry I couldn't understand.
13 You know Milton have told some of my family members not to
14 talk to my family regarding this case.

15 Q But what does that have to do with whether you want to
16 represent all of these other workers in this lawsuit?

17 MR. O'HEARN: All right. I want to end this line of
18 questioning. I am going to object on attorney/client
19 privilege. The goals of the lawsuit are between our clients
20 and us.

21 BY MR. ALVAREZ:

22 Q That is a speaking objection. He is the class representative.
23 You are putting him up as a class representative. He needs to
24 answer these questions. I mean it is a basic class action
25 101. He is the class rep, he needs to know this and he needs

1 to answer these questions especially if I have a
2 decertification motion that I am going to have to file if this
3 gets certified. I don't think that there is any
4 attorney/client privilege in what I am asking him. It is his
5 knowledge what I am asking.

6 So I will ask you again, sir, do you want to
7 represent all of these other workers in this lawsuit or are
8 you just suing for what happened to you? Yes or no.

9 A I will go and tell the jury in front of a Judge if they are
10 the ones that are afraid to go against Milton because they are
11 existing in poverty, they are in Guatemala.

12 Q But that doesn't answer my question. Are you wanting to sue
13 just for you -- what happened to you or do you want to
14 represent all of these workers as well?

15 A I will say to sue, even though all the names that you gave me
16 none of them have the courage to do it.

17 Q Okay. So you do want to represent everybody that worked for
18 Purpose Point in 2018 and 2019?

19 A As I say, I will go and I will go there and I will tell the
20 truth.

21 Q Okay, great. So of all of these workers, how many of them
22 have the same claims as you? Because you have already
23 confirmed that at least about 36 don't have the same claims as
24 you.

25 A Of all the people that you listed, none of them I told you

1 would be willing to sue Milton, to have the courage to tell
2 the truth. And you said that is not what I am asking, do you
3 remember? All of those people that are there, no one of them
4 is going to be willing to, but you wanted to ignore the words
5 that I said.

6 Q Luis, I asked you of those 36 or so that we talked about so
7 far, how many of them did you talk about this lawsuit with? I
8 asked you that question, right?

9 A Yes.

10 Q And you said none aside from the five that you are in this
11 lawsuit with right now, you haven't talked to anybody else
12 about this lawsuit, right? Yes or no?

13 A Directly?

14 Q Yes.

15 A No.

16 Q Okay. So then how do you know -- how do you know, and I have
17 asked you this for about 36 of these people already. How do
18 you know that any of these 60 some people have the same claims
19 that you're making against my client if you haven't talked to
20 them?

21 A How do I know? Bring each of them and talk to them one by one
22 to them and you will find out. So, I'm sorry, I am lost.
23 Could you repeat the question that you asked?

24 (At 2:04 p.m. question was read back as follows)

25 COURT REPORTER: Okay. So then how do you know --

1 how do you know, and I have asked you this for about
2 36 of these people already. How do you know that
3 any of these 60 some people have the same claims
4 that you're making against my client if you haven't
5 talked to them?

6 A They are not going to talk because of being afraid of Milton
7 making them go to Guatemala. And you make mention of Fabi
8 Moreno, Milton left him in Guatemala. Mefi he doesn't know
9 the last name.

10 Q Mefibocent Morales De Paz.

11 A Also David was left behind. And others. Why because if he
12 left them there they are not going to be willing to talk.

13 Q When was this lawsuit filed?

14 A I don't know exactly.

15 Q Do you know the year?

16 A All I know is when I start talking to Teresa.

17 Q And when was that?

18 A I said in 2018.

19 Q Okay. So this lawsuit was filed March 31st, 2022. Okay. So
20 from 2018, when you say you talked to Teresa, until
21 March 31st, 2022, how many of these people did you talk to
22 about suing?

23 A All of them talk regarding the hard work, working in the
24 middle of the night, working late, about the food, everything.
25 But myself to go and support me, I was not going to say that.

1 Q So you didn't talk to anybody?

2 A Because if I went and I talked to, one of them was going to go
3 and talk to Milton. One of them in the countersuit I remember
4 a little bit they talked to Milton to say that I was going to
5 sue him. I remember Teresa saying that, that there were some
6 names.

7 MR. O'HEARN: You don't need to say anything about
8 what Teresa told you.

9 BY MR. ALVAREZ:

10 Q But my question was from 2018 when you first had contact with
11 Migrant Legal Aid with Teresa, until 2022 when the lawsuit was
12 filed, when this all started, you didn't talk to any of these
13 workers about this lawsuit aside from the two or three I think
14 that you mentioned, correct?

15 A Yes.

16 Q Okay. And so back to the original question. Are you
17 representing just your claims against my clients or are you
18 going to represent the claims of all of these workers, the
19 ones that you haven't talked to, the ones that you don't know
20 whether they have the same claims as you or not. Is that what
21 you are doing?

22 A I will go and present these partners, but they won't talk
23 because they will be afraid of staying in Guatemala.

24 Q Okay. So which workers of the 60 some, have the same claims
25 as you? Because I have asked you about 36 of them already and

1 you said none of them. We can go through the rest of the
2 list.

3 A My answer was I don't know, because if you brought one of each
4 of them, one at a time without Milton and they will say what
5 is the truth.

6 Q You or Hervil or Julio could have done that in those four
7 years, right? I mean you were able to talk to Darwin, Leonel
8 and Artemio and they were able to join the lawsuit just last
9 year, so why didn't you talk to anybody else?

10 A When the Department of Labor went to us, who would be willing
11 to talk?

12 Q You already talked with -- you had already talked with Migrant
13 Legal Aid from 2018, right? I assume they explained that you
14 had rights that they could protect you, and from 2018 to 2022
15 you didn't talk to anybody else, at least from what you said
16 here today and only three other people, Artemio, Leonel and
17 Darwin joined this lawsuit and that was just last year, right?

18 A Yes.

19 Q Okay. So I will ask you begin, sir, are you going to be
20 representing the claims of all of these other workers or just
21 your own?

22 A I am going to say it this way. Even though they meet, I would
23 be willing to go there and talk on their behalf. Two very
24 different things. Ask me out of all of those people who will
25 talk, I will say I don't know. Because they will be afraid of

1 Milton leaving them there. No one left courage to do it
2 because of the same because he left them there.

3 Q My question when I asked you for those 36 some people wasn't
4 whether they would speak up, my question was did you know
5 personally whether they had the same claims against my clients
6 that you did and you said no.

7 A I don't know.

8 Q For a couple you said no, but yes, for the most part you said
9 I don't know. So for any of the remaining workers, do you
10 know whether they have the same claims or not?

11 A They all are going to complain among themselves, but no one is
12 going to be willing to speak up because of being afraid.

13 Q That doesn't answer the question. Let me ask you another
14 question. Roberto Garcia Rivera, did you know him? Roberto
15 Garcia Rivera.

16 A That name I don't know if he was there in 2019.

17 Q Okay. Have you talked to him?

18 A He was not there in 2019.

19 Q So he worked in 2018?

20 A As I say, if you show me a picture of him.

21 Q But he worked one of those three years?

22 A I said if you show me a picture I will tell you, but it is not
23 the same. You show me a picture and you show me a name. You
24 are going to confuse me that way.

25 Q Bridman Uriver Gomez-Moreno, he is your cousin, right?

1 A Yes.

2 Q Bridman, let's talk about him. What claims does he have,
3 because before I asked you already and you said you didn't
4 know. But you're ready to go to Court to represent him,
5 right? So tell me what claims does he have?

6 A Waking up at 2:00 a.m. with a light and back at 10:00 p.m. So
7 what claim do they have, what kind of work for -- what kind of
8 work is that, working from 2:00 a.m. to 10:00 p.m. was the
9 last thing.

10 Q So let's stick with Bridman then. Bridman worked in 2018 and
11 2019. 2018 are you saying that every day that he worked, he
12 started his work at 2:00 a.m.?

13 A Most of the time.

14 Q And he ended his day at 10:00 p.m.?

15 A Many times they ended like that.

16 Q Okay. When didn't they?

17 A I don't know, you can ask them. You can ask them -- you can
18 ask them in a little room for you to tell them the truth.

19 Q But I am asking you. You want to represent these workers.
20 You don't know?

21 A I say they don't have the courage to tell, to go to the Judge.
22 And go and tell the Judge. I said Mr. Judge, I am here
23 because all of us went through the same and no one has the
24 courage to speak up. That is the small space what you are
25 asking, and they are -- seems like you're talking to each of

1 them if you ask them by themselves alone and you ask.

2 Q Because you don't know what hours every single person worked,
3 every day that they worked, every week that they worked and
4 each of the years that they worked, correct?

5 A Do you believe that I am going to come, I am going to say
6 names and then Milton is going to take it against them.

7 Q We have the names.

8 A Of everybody?

9 Q Yes, we have everybody's name here.

10 A You and I are talking. We are talking about this. Do you
11 know that if Milton cannot go to Guatemala and say oh, this
12 person talks for them to stay. And he said you do understand
13 that. But you have to -- I don't know when the rest of the
14 parties are here when they do the interviews.

15 Q So are you saying that you have spoken to workers about the
16 lawsuit and you just lied to us earlier?

17 A All of them have spoke among themselves.

18 Q But I am asking -- I asked you if you had spoken to all of
19 these workers and you said no.

20 A Because I haven't. They spoke among themselves and you can
21 hear that, that was the answer I gave you. I didn't lie in my
22 answers.

23 Q You haven't spoken to any of the workers, correct?

24 A Exactly. I haven't. But you are asking if they spoke, Milton
25 is aware that they work to support the people in Guatemala,

1 but they deal with that, so at least the family can eat over
2 there.

3 Q So again, you haven't spoken to these workers from 2018 to
4 2022 when the lawsuit was filed, correct, about this lawsuit?

5 A Regarding their suit. As I say, if I say anything, they are
6 going to run to tell him.

7 Q So you have talked to workers about this lawsuit?

8 A They spoke among themselves.

9 Q But you haven't talked to them about this, right?

10 A Mefi has said oh, Milton is talking. They know I work here.
11 They know it's hard, it's a very killing work, but it is
12 something they don't speak of just for not staying in
13 Guatemala.

14 Q I understand that, sir. But my question is aside from those
15 people that you have already acknowledged that you have spoken
16 to about this lawsuit, you haven't spoken to anybody else
17 correct? It's yes or no.

18 A I do not know how to explain it.

19 Q There is nothing to explain, either you have talked to them
20 about the lawsuit or you haven't. You have already said
21 several times that you haven't, but you keep kind of saying
22 that maybe you have and you don't want to tell us.

23 A Not in any time I didn't say that. And any time I said
24 that -- I said that they spoke among themselves.

25 Q So then let's make it very clear so there is no confusion.

1 Yes or no. Have you spoken to any of these 60 some workers
2 about this case aside from the ones that you already
3 acknowledged that you did? Like Mefibocet. Yes or no?

4 A I haven't talked to any of them about how this suit is going.

5 Q Did you talk to them before you filed suit?

6 A You know what was a mistake here? You for the interview, you
7 need to interview me and leave me in there, because while
8 Milton is listening to us he is going to say this in Guatemala
9 and that will affect many that they have to feed their family
10 to come here.

11 Q This is all being recorded, sir. It's like you are in Court.
12 You swore under oath to tell the truth.

13 A And I am telling the truth.

14 Q So then it shouldn't matter whether he is here or not. If you
15 are telling the truth, then you're telling the truth.

16 A Well, we can go back to the person, Milton said on the list
17 there, he lost the first interview.

18 Q I don't know what that means, but we are veering off. Let's
19 get back to the list so we can go through and make sure that
20 there is no confusion. Let's take a break now.

21 (At 2:27 p.m. off the record)

22 (At 2:38 p.m. on the record)

23 BY MR. ALVAREZ:

24 Q Okay. Back on the record. Can you get me this exhibit.

25 (Exhibit 4 was marked)

1 Q Back on the record. All right. Mr. Gomez, do you see at the
2 bottom I have just handed you Exhibit Number 4. Do you see
3 the numbers at the bottom right-hand corner, the numbers?

4 A Yes.

5 Q If you would flip to the one that is 6658. For the record,
6 this is a document that is in Spanish. Can you read Spanish?

7 A Yes.

8 Q You want to take a minute to review that real quick. We will
9 go off the record while he is reviewing it.

10 (At 2:42 p.m. off the record)

11 (At 2:44 p.m. on the record)

12 Q Have you had a chance to review that?

13 A Yes.

14 Q We are back on the record. So do you know what that document
15 is?

16 A It is like a suit of some sort.

17 Q Have you ever seen it before?

18 A No.

19 Q Who is it against?

20 A Luis Alberto Gomez Castro.

21 Q Who is that?

22 A My dad.

23 Q Who is it by?

24 A Deibin Belarmino Gomez Zacarias.

25 Q There are a list of how many people who have signed on to

1 this?

2 A Here it doesn't say the people. Is it the following page?

3 Q Yes, 654. How many people are signed on to this document?

4 A Appears to be 45 is what I can see here.

5 Q Okay. Let's go through those 45 real quick, if you don't
6 mind. Favio Moreno Trabanino. It is the first one.

7 A Okay.

8 Q Is he a Purpose Point -- former Purpose Point worker?

9 A It's not an ex-worker, it is Milton brought him back to
10 Michigan.

11 Q Is he in Michigan right now?

12 A He came last year. I think he came last year, I don't know.

13 Q So he may have came last year, but he is not here right now?

14 A No.

15 Q Look at number four, Koeman Anibal Lopez Alonzo. Do you know
16 that person?

17 A As I said before, it is best to show a picture.

18 Q Do you know if all of these 45 individuals that signed on to
19 this document are former Purpose Point workers?

20 A You don't call them ex-worker because Milton left them and
21 then he brought them back, so you cannot call them ex-workers.

22 Q Well, if they are not working right now, they are ex-workers.
23 If they are here and they are working, then they are workers,
24 okay. So right now they are not here working, correct, so
25 they are ex-workers. They may be future workers, but we don't

1 know that yet, correct?

2 A I don't know.

3 Q So what is this saying?

4 A It says Deibin Belarmino Gomez Zacarfas brings this suit
5 against my dad.

6 Q And what was the reason?

7 A They claim my dad threatened them.

8 Q Forty-six people are saying that your dad threatened them,
9 right?

10 A Signatures, but -- and the statement of each of them, the
11 proof of each of them, where are they.

12 Q We can talk about that later, but right now this document,
13 that is what they are saying, correct?

14 A Yes.

15 Q Okay. And they are all saying that your dad has been
16 pressuring them to join this lawsuit in the United States
17 against my clients, right? That is what it says?

18 A That's what he says.

19 Q And it says that on different occasions he has shot into the
20 air at several of us and tried to run us and our families over
21 with his vehicle. That's what it says, right?

22 A That's what it says.

23 Q Does your dad own a gun?

24 A Yes.

25 Q And he is a former law enforcement officer in Guatemala,

1 right?

2 A Yes.

3 Q So he knows how to use a gun?

4 A He knows the laws of Guatemala. He is aware of the laws of
5 Guatemala.

6 Q And it says that your dad insulted with obscene words and was
7 angry because Deibin did not want to support you and your
8 brother in this lawsuit, right?

9 A That's what it says.

10 Q Do you have a reason to doubt any of these people?

11 A This is easy. That's an acquaintance that Deibin that is also
12 here. And Deibin is going to travel to Michigan during this
13 time. Possible.

14 Q But again, does it surprise you that there would be these
15 accusations against your father?

16 A Those are lies.

17 Q Okay. So 46 people are lying to a Court in Guatemala?

18 A Yes.

19 Q Okay. I believe about eight or the ten of them on Monday went
20 and gave testimony under oath in Guatemala to the Judge about
21 this same thing. Did you know that?

22 A No.

23 Q Because you don't talk to your dad about that stuff, right?

24 A He is in charge of this deal.

25 Q And you don't talk to your dad about this lawsuit here in the

1 United States, right?

2 A I prefer not to involve them in all of this. It's enough with
3 the lies that they are you putting in Guatemala to this person
4 who is over 60 years old.

5 Q Because you don't talk to your dad about this lawsuit there
6 would be no reason for him to want to convince anyone to join
7 your lawsuit, right? Correct?

8 A My problems with Milton are mine. They don't -- they have no
9 reason why to sign or to take the note when they are right.
10 They came here. And I said I swear to tell the truth because
11 I am saying that because I am aware of that.

12 Q So what is the difference between you sitting right here
13 swearing an oath to tell the truth and them swearing an oath
14 to tell the truth?

15 A Since 2020, as far as I am aware, they tried to sue my dad and
16 my dad was not even notified about that. When they go to file
17 a suit, my dad needs to receive an order of appearance and he
18 didn't get that. We have a mayor they went there to try to
19 make more sheets to collect more signatures according to them
20 and they do that just because of the problem between Milton
21 and I. So this problem is between Milton and I.

22 Q Well, the problem is, it is not between you and Milton because
23 you decided that you want to represent everybody else.

24 A And because they are scared that all saying -- they are lying.
25 There are going to be 60 people to say I swear and you are

1 going to have the piece of paper we are suing Luis Alberto for
2 this and that and the other. But to sue, they had to have
3 proof and not be afraid I am going to join a group otherwise
4 my boss is going to leave me behind. And I'm going to make
5 something clear, something that maybe you haven't seen here.
6 I read that Deibin Belarmino is single and he is not single.
7 He has a partner and he has a daughter. So you can see where
8 the lie starts.

9 Q You mean like when you told me you had an ex-wife and she
10 turned out not to be your wife and you have kids?

11 A I lie? I am still single.

12 Q Okay.

13 A So I say an ex with children.

14 Q I am glad what you say. It is not enough to just come and
15 swear to tell the truth, you have to have proof, right?

16 A Yes.

17 Q Great. So what proof do you have that when you were working
18 at Purpose Point that you worked from 2:00 a.m. to 10:00 p.m.
19 every day almost. What proof do you have? Not just your
20 testimony.

21 A Exactly. I said I will tell the truth today. I used to buy
22 like a flashlight to put here in the middle of the night so I
23 could see.

24 Q My question was, what proof do you have that you worked from
25 2:00 a.m. to 10:00 p.m.? What proof do you have? Not just

1 your words, because you told me that wasn't enough. So what
2 proof do you have? Just like you don't want to accept their
3 words, correct? This is not enough. So what proof do you
4 have?

5 A I do have paperwork.

6 Q I am just asking. I don't see anything. I haven't received
7 any proof. We gave all of the records that we had.

8 MR. O'HEARN: Are you asking my client to comment on
9 like your documents?

10 MR. ALVAREZ: No, I am asking what proofs he has.

11 MR. O'HEARN: I feel like we are getting a little
12 argumentative and I want to stop that where we can.

13 BY MR. ALVAREZ:

14 Q So what proof do you have that you worked from 2:00 a.m. to
15 10:00 p.m.?

16 A Those I cannot tell you.

17 Q Do you have proof?

18 A That I cannot tell you.

19 Q Why can't you tell me?

20 A What I can tell you is I don't know.

21 Q I mean do you have proof or do you not have proof or is it
22 just your word?

23 A I cannot tell you that.

24 Q Because you don't trust their word, right, this is not enough
25 you said, correct?

1 A I can't trust their word because they tried that more than
2 once. Do you understand. The first time they sue my dad, all
3 of them went there when they went to the courthouse all of
4 them were there to try to make my dad feel stress knowing that
5 they were lying.

6 Q You are talking about recently, right?

7 A Yes.

8 Q Because your father, I think it was two years ago, also had a
9 complaint raised against him by someone else for intimidation
10 and assault. Do you remember that or did you not talk to your
11 dad about that?

12 A Assault?

13 Q I think they call it -- I don't know how to say it in English.
14 In Spanish it is like aggression. I don't know how to say it
15 in English. But there was a complaint that was filed against
16 your dad a couple of years ago. Were you aware of that, for
17 similar acts against other people?

18 A That complaint they put that years ago. And not long ago, my
19 dad fought that. They put a complaint from years ago. They
20 are just going to get there right now. Something from years
21 ago. You can tell what kind of lie are they saying.

22 Q But two years ago was before this lawsuit started and this was
23 with people that have nothing to do with Purpose Point.

24 A They do have because in that paper they said that they are
25 afraid because they worked for the company Purpose Point for

1 the harvesting. So yes, it has to do with that because when
2 they did the paper, it says there exactly.

3 Q I think we are talking about something else. There was a
4 complaint made against your dad two to three years ago by
5 someone who is not a worker for Purpose Point, who never
6 worked for Purpose Point, who we didn't know about, who filed
7 a complaint against your dad for similar acts of intimidation.
8 Were you aware of that or not? If you don't know, that's
9 fine.

10 A That is a lie. Because even you show that piece of paper from
11 two or three years ago. Now they are going in this lawsuit
12 when they did that countersuit. So your claim is talking
13 about three years ago has nothing to do and that is not true.
14 That has a lot to do with it.

15 Q So you weren't aware of that other case with your dad?

16 A I am telling you that those pieces of paper my dad got them
17 not long ago. Now that this start between Milton and I, those
18 papers show up two or three years ago. They are workers -- I
19 have to check a word he keeps saying. It doesn't mean
20 anything, I'm sorry. It's just gibberish, I'm sorry.

21 Q That's fine. Yes. There have been several complaints filed
22 by former Purpose Point workers and their families. I agree
23 with you, okay. What I am talking about is that we discovered
24 that there was a complaint that was filed against your dad not
25 by any former Purpose Point worker or their families, but by

1 some other person for similar acts of intimidation and
2 aggression. So I am asking you if you knew about that other
3 complaint?

4 A The one before?

5 Q One that has nothing to do with any Purpose Point worker.

6 A The one right now? The one before?

7 Q One way before Purpose Point even was an issue. If you don't
8 know, just say you don't know. That's fine. That is not a
9 problem.

10 A Milton bring a paper way before he comes -- he brought a piece
11 of paper, he did like a lawsuit and then you're telling me
12 that has nothing to do with Purpose Point. Then why his
13 brother is writing this sheet? Tell me.

14 Q So there is 56 or 57 individuals, not all of them Purpose
15 Point workers, some of them are family members of Purpose
16 Point workers that have filled a complaint against your dad.
17 And Emil and I think two against Artemio or Darwin, I'm not
18 sure for acts of intimidation where they are accusing your dad
19 and those others of trying to force them or intimidate them to
20 join this lawsuit. Are you saying that all of those people
21 are lying?

22 A His niece did a lawsuit against Darwin, so what does that have
23 to do with Purpose Point if the niece of the contractor of
24 Purpose Point, what has that to do with Purpose Point?

25 Q I was talking about way before even this lawsuit was filed.

1 But we can ignore that and let it go for now. You obviously
2 don't know about it, and that is fine. So what I am hearing
3 you say is all of these people who have sworn to tell the
4 truth and signed this document before the Court and have given
5 testimony as recently as this Monday against your dad and I
6 think Darwin and Artemio. They are all lying?

7 A They are giving testimony against Darwin, Leonel and Luis
8 Gomez, and Artemio, against my parents because of the lawsuit
9 that we have between Milton. And I and also, the people that
10 we already mentioned, they are already there.

11 Q What you are saying is they are all lying?

12 A Yes.

13 Q I need to take a quick break.

14 (At 3:09 p.m. off the record)

15 (At 3:16 p.m. on the record)

16 BY MR. ALVAREZ:

17 Q Back on the record. All right, so let's go back to 2017. How
18 did you first find out about the opportunity to work at
19 Purpose Point?

20 A Milton contacted us.

21 Q How did he do that?

22 A Called over the phone.

23 Q What did he say to you? He was here in the U.S., right?

24 A Yes. He said that he saw an opportunity to go work in
25 Michigan in the fields and he explained what we were to do.

1 Q And what was the next step after -- because I am assuming you
2 agreed, right, because you came?

3 A Yes.

4 Q So what was the next step after he called you and explained to
5 you what you were going to be doing, what was the next step in
6 that process?

7 A We had to go to the capitol to go to the consulate to get a
8 passport. And he said that we need to give money for expenses
9 for the trip from there to here, all the money that the
10 company was going to spend.

11 Q Okay. So you had to go to the Guatemalan capitol, to which
12 consulate?

13 A They call it the Guatemalan Consulate. That is what they call
14 it.

15 Q To get your passport?

16 A Yes.

17 Q What was the next step after you got your passport?

18 A We waited for them to give us the Visas.

19 Q Who is "we"?

20 A The other 13 that travel in 2017.

21 Q Did all of you go to the Guatemalan Consulate to get it?

22 A A group, yes, 14.

23 Q You all traveled on a bus together or how did you get there?

24 A Yeah, we hired a bus.

25 Q Okay. And had you already made an appointment with the

1 consulate to get your passport?

2 A Yeah, we had to go there. It was a huge line.

3 Q Do you have to make an appointment days ahead or do you just
4 show up and get in line and wait?

5 A We need to get there early and try to get in line.

6 Q How far away is it from your house?

7 A Approximately six hours.

8 Q Okay. And so you and 13 others traveled together and were
9 waiting in line?

10 A Yes.

11 Q When -- was it just to get your passport or did you also have
12 to have an interview for the work to get the Visa?

13 A Just for the passport.

14 Q Okay. Did you have to do an interview with someone from
15 Purpose Point before you were able to come to the United
16 States?

17 A The only thing that they told us was we need to give a certain
18 amount of money to be able to travel to here and gave us a
19 talk about the harvest the months, about how to support here.

20 Q Who told you that?

21 A At first was Milton and then his niece showed some videos
22 about how to use the tools, how do that.

23 Q Was that in Guatemala though?

24 A Yes.

25 Q Okay. So in Guatemala you had to wait for the interview to

1 get your Visa?

2 A Yeah. I had to wait for them to give Milton the Visas.

3 Q So once he was given the permission to bring workers, then you
4 got an interview to get your Visa to come?

5 A We just waited to be accepted for the Visa.

6 Q Okay. Did you have to talk to anybody about the work and
7 whether you could do the work?

8 A Just with Milton and Darcy his niece.

9 Q Do you remember having signed any documents in Guatemala?

10 A I don't remember exactly. I can remember a contract, yes.

11 Q Do you remember what that contract said?

12 A It was about how much we were going to get paid, what things
13 we need to do, what things we shouldn't do at work.

14 Q And who went over that contract with you?

15 A At first it was explained by Darcy, one person, and then
16 Milton.

17 Q Darcy?

18 A His niece.

19 Q Okay. And then you signed the contract in Guatemala.

20 A I don't remember exactly.

21 Q Neil, can you give me 61?

22 (Exhibit 5 was marked)

23 Q Can you look at that document that's been marked Exhibit 5.

24 And if you can turn to the third page. There you go. So on
25 this page, is that your signature?

1 A Yes.

2 Q And this is dated June 12th, 2017, is that correct?

3 A Yes.

4 Q And this is the document that you signed in Guatemala,
5 correct?

6 A The one I sign, yes.

7 Q Okay. Now when -- and the document is in Spanish, you can
8 read it. What did you understand about when you were going to
9 be working in the United States for Purpose Point?

10 A He said we need to work from Monday through Saturday and they
11 were going to pay us by the hour.

12 Q And it was a certain amount they were going to pay you per
13 hour, right?

14 A Yes.

15 Q Did you know before you came to Michigan to work what the
16 period of time was that you were going to be working?

17 A Could you repeat that?

18 Q Before you came to Michigan, did you know what like what
19 period of time you were going to work, from what month to what
20 month?

21 A In 2017 we got here into June, because the Visa didn't get in
22 until May. So we knew we needed to come back in the month of
23 November. We did not know on the specific date.

24 Q Why was it the month of November, do you know?

25 A Milton said it was that month, I don't know why.

1 Q Did the contract say that it was during that period of time?

2 A The contract tried to explain that to us basically.

3 Q So you understood that you would be here from the, I guess
4 2017 it would have been maybe June, end of June, early July,
5 but you would have to leave in November?

6 A Yes.

7 Q And did you know then that you would have -- that you would be
8 working that period of time from when you got to the United
9 States to Purpose Point until mid November?

10 A Yes.

11 Q Okay. Were you expecting to work the entire time that you
12 were here?

13 A According to the contract it said that he was going to provide
14 work.

15 Q He had to have it available because otherwise you're not
16 coming here for a vacation you are coming here to work, right?

17 A Yes.

18 Q Okay. So you have gotten the interview with his niece and
19 with him. You have gotten the Visa approved. Okay. What is
20 next?

21 A After they told me the Visa was approved. We got the bus and
22 we asked how much was it to get to the capitol. Milton said
23 here are tickets, there were two stops or something like that.
24 And then we come here. And he said to come here, we need to
25 pay certain amount of money for the expenses.

1 Q How much?

2 A 2017 it was approximately \$2,500 for everything.

3 Q So that is what you had to pay?

4 A Yes. That included the bus, the food, the plane ticket and
5 everything.

6 Q Okay. So you paid that before you came or those were the
7 costs that you had on the way here?

8 A We gave money for it.

9 Q Okay. Who did you give it to?

10 A We give that in cash.

11 Q Who did you give it to?

12 A To his family over there, his niece.

13 Q Okay. So you gave them how much?

14 A There he asked for ten thousand dollars.

15 Q Ten thousand dollars?

16 A Quetzal, Guatemalan currency.

17 Q Okay. So ten thousand quetzals?

18 A Yes.

19 Q Which what you are saying was roughly 2500 in U.S. dollars?

20 A That was for the expenses, for the plane tickets and for the
21 paperwork that he had to do. And it was in quetzals because
22 we were to the capitol, not just one time we were more than
23 once to get the passport.

24 Q But did you pay your trip there or did you have to pay his
25 niece Darcy so she could get the transportation?

1 A For all the paperwork that he would need here or for the work
2 that he was doing here.

3 Q Okay. When did you pay him or pay Darcy the ten thousand
4 quetzals?

5 A I don't remember exactly.

6 Q Was it at her house?

7 A Yes, I remember dropping that off.

8 Q Okay. Did anybody else -- did you see anybody else also
9 giving ten thousand quetzal?

10 A He told the rest to go ahead and drop the money over there.

11 Q But my question is when you went to give your money, did you
12 see anybody else also dropping off their money?

13 A They talk about that after the fact, that Alberto went there
14 and the rest, so the family members they send money here in
15 the U.S. so Favio could come also.

16 Q So a family member of Favio sent money to Milton?

17 A Yes.

18 Q He sent it like by Western Union or something or Money Gram.

19 A Who knows how they did things?

20 Q Have you talked to any of them to see if they can come up with
21 that evidence, that proof?

22 A I never ask that question.

23 Q You never saw anybody actually giving money to Darcy, but you
24 heard some people talking about that?

25 A They said that.

1 Q But you didn't see it happen?

2 A All I saw is when another one went there to drop off.

3 Q Who?

4 A I don't remember if Ricardo Moreno gave a portion there and an
5 aunt gave one thousand of that money. It was a lot of money.
6 It was very hard to get that amount.

7 Q And it was ten thousand quetzal?

8 A Yes.

9 Q Was there anything else or was it just ten thousand quetzal
10 that you had to give?

11 A On top of that, the expenses that we incurred. That was just
12 for him. But then the expenses outside of that.

13 Q Let's go over the expenses that you had apart from that. What
14 expenses did you have? For your passport?

15 A Yes. And food and things like that. Expenses like that.

16 Q Because you didn't already have a passport, correct?

17 A No, I didn't.

18 Q What other costs did you have besides the travel to get your
19 passport and the food that you needed to eat along the way?

20 A So we get in line for the passport. We need to pay extra to
21 activate to make the passport quicker, because they say the
22 harvest was starting, so we need to move go.

23 Q Who did you pay that money to?

24 A He said a boy, I think it was \$150. He said I can find a way
25 for you to get it quicker.

1 Q So it was like I can't think of the word in Spanish.

2 A Bribe.

3 Q Bribe. Thank you. So it was a bribe to Government officials
4 so you could move faster in the line?

5 A It was somebody who was working there. He didn't look
6 official, but it was somebody who was there?

7 Q It worked.

8 A Yes.

9 Q What other costs did you have besides that bribe?

10 A When we were in the -- we went to the airport we had to buy
11 food at the airport and things like that.

12 Q And the food in the airport isn't cheap, is it?

13 A Not at all.

14 Q So how much do you think you spent on food in the airport on
15 the way here?

16 A I try not to spend a lot, so not to use too much money.

17 Q So you are in the airport. You arrive in Michigan. Did you
18 arrive in Grand Rapids or Detroit?

19 A No. We go to Miami. And I don't know very well, but from
20 Miami to Chicago. And then they went to pick us up in the
21 van.

22 Q Okay. So you flew into Chicago and then Milton picked you up
23 in a van and brought you to Oceana County?

24 A Yes.

25 Q And when you arrived in Michigan, where did you go? Where did

1 Milton take you?

2 A I don't remember exactly.

3 Q Okay. Was it at night or in the morning or in the afternoon?

4 A I remember it was at night.

5 Q Where were you staying in 2017 when you were here in Michigan
6 working?

7 A There at Port Amis. Port Amis is the name of the rancher. He
8 allowed us to stay in like a trailer.

9 Q How big was the trailer?

10 A It was like a three-quarter.

11 Q How many trailers were there?

12 A I think it had like two rooms, I don't remember.

13 Q Okay. And did you each have a bed?

14 A Small beds and the co-worker had to live in the sofa.

15 Q Okay. And when you arrived, did you eat? I am assuming you
16 were hungry?

17 A Very hungry. Very. Very.

18 Q So what did you eat that night?

19 A When Milton went to pick us up, we stop by to get a hamburger.

20 Q Had you ever been in the United States before?

21 A No.

22 Q So was that your first taste of American food outside of the
23 airport?

24 A Yes.

25 Q Which burger place was it that you stopped at?

1 A I don't remember.

2 Q Hope it wasn't McDonald's.

3 A No.

4 Q So then that night you got to the trailer and I am assuming
5 you went to bed pretty soon after you got home?

6 A Yes.

7 Q So tell me about the next day.

8 A He got up and there was work already there.

9 Q What kind of work was it?

10 A It was the end of the season, because we arrive late.

11 Q What time did you start?

12 A The first day was around seven. So we didn't know about the
13 work, so we needed to practice how to pick it up.

14 Q You watched video though, right?

15 A Yes.

16 Q It is a little different on video than it is doing it in
17 person.

18 A Yeah. They hurt a lot. Your fingers, there is a little pain
19 to do it.

20 Q Were you on like a trailer, a machine or something to get the
21 asparagus?

22 A Yes.

23 Q Okay. How was that?

24 A It looked like a little small plane. It had like two things
25 on the side, two wheels on one side and two wheels in the

1 middle and two wheels on the other side.

2 Q And how were you positioned to pick the asparagus on that
3 machine or tractor?

4 A We sat on the side in one box and on the other side in a box.
5 And you are sitting down getting ready to pick up.

6 Q Just with your hands? Did you have any tools?

7 A By hand.

8 Q And was that your first time ever harvesting asparagus?

9 A Yes.

10 Q How late did you work?

11 A Because there was not much left asparagus, just right after.

12 Q Okay. Did you take a break for lunch?

13 A Half an hour.

14 Q What did you eat asparagus?

15 A At first I didn't like it. I don't remember what I ate.

16 Q Was it food that you had prepared or was it food that was
17 brought to you?

18 A We prepared it.

19 Q Okay. You prepared it that morning before you came to work,
20 right?

21 A Yes.

22 Q Okay. Had you gone to the store to get the groceries to make
23 the food?

24 A When we got there, there were some supplies already in the
25 fridge.

1 Q So the refrigerator was stocked with food for you guys when
2 you got there?
3 A It was not full, just a little bit.
4 Q You had food at least to make your meal the next day?
5 A Yes.
6 Q Did you have breakfast?
7 A Coffee.
8 Q Could you have made breakfast if you wanted to?
9 A No. We didn't have much to fix a lunch to bring it for lunch.
10 Q When you were done working. You went -- you were taken back
11 to the trailers?
12 A Yes.
13 Q So you had dinner?
14 A Yes.
15 Q What did you eat?
16 A I don't remember exactly.
17 Q Was there food for you to prepare?
18 A Yes.
19 Q Okay. That first week that you were in the U.S., did you go
20 to the grocery store?
21 A When we got our check we needed to buy our things.
22 Q When you got your first paycheck?
23 A Yes.
24 Q How long was it before you got your first paycheck?
25 A About ten days or so.

1 Q And for those ten days did you have food to eat for breakfast,
2 lunch and dinner?

3 A We try not to eat a lot, just enough to wait until we got our
4 paycheck.

5 Q Where did that food come from that you were able to use to
6 prepare your meals?

7 A Milton said there were some things there for us to eat.

8 Q Because this was still in 2017. You two at that time I assume
9 were getting along?

10 A The troop, we were excited to work here, but we did not know
11 the reality.

12 Q Okay. When did reality hit then?

13 A That year we realized that it was hard to send down to our
14 families. The work was hard. We needed to keep to stay.
15 Milton said next year is going to be better, so we were
16 excited.

17 Q The reality hit because the work was really hard, right?

18 A Always.

19 Q And you weren't used to that kind of work?

20 A Yes. We used to work in the fields in Guatemala.

21 Q Where is the reality then, where is the reality that you are
22 talking about that hit?

23 A During the zucchini we need to get up early, really early,
24 rubber boots, a vest, rubber gloves and got up early to pick
25 up the zucchini.

1 Q How long did the zucchini season last?

2 A I don't know exactly. It depends. The ranch was running
3 behind because they have zucchini. We were there helping out.

4 Q Was it two weeks, six weeks, more?

5 A More.

6 Q What time would you get up to do the zucchini?

7 A At 2:00 a.m.

8 Q Okay. So I mean is that when you had to be to the field or
9 you woke up?

10 A We had to go to the field to work.

11 Q Okay. So you had to get up earlier then to get ready.

12 A We had to get our lunch ready the night before and water and
13 then as soon as the alarm go off we have to leave right away
14 to go to work.

15 Q Were you a crew leader in 2017?

16 A No.

17 Q Who was the crew leader?

18 A I think one of them was the Ricardo and Tony was the other
19 one, it was Milton's nephew.

20 Q Which crew were you on?

21 A Tony's.

22 Q On a typical day picking the zucchini, what time would you end
23 harvesting?

24 A The sooner the better. The rancher has like asparagus or
25 something like that. We just go there after that. We go

1 there at ten or we had to go and clean.

2 Q So on a typical day, what time would you end work?

3 A From 2:00 a.m. to 9:00.

4 Q So you would work from 2:00 a.m. until 9:00 p.m.

5 A Yes.

6 Q Okay. And you had a half hour lunch?

7 A We take that lunch, because we only ate for like 15 minutes,
8 just to hurry up and that is all.

9 Q Did you take time for dinner?

10 A We get there, we take a shower and then we cook.

11 Q I meant during the day from 2:00 a.m. to 9:00 p.m. you only
12 ate once?

13 A We get tired, but then we still cook dinner and then we cook
14 for the next day.

15 Q What time did you go to sleep then?

16 A 11:00, 11:30.

17 Q So 11:00, 11:30 and then you have to be back up the next day
18 by 2:00 a.m. to go to work?

19 A I'm sorry, could you repeat what you ask, because I think he
20 said from 2:00 a.m. to 9:00 p.m. I felt like he said it was
21 9:00 a.m.

22 (At 3:57 p.m. question was read back as follows)

23 COURT REPORTER: I'm sorry, could you repeat what you
24 ask, because I think he said from 2:00 a.m. to
25 9:00 p.m. I felt like he said it was 9:00 a.m.

1 A Yes.

2 Q Okay. So you slept maybe three hours?

3 A Three or four hours depending. Sometimes we slept little if
4 we had too much work we would say okay, let's go rest.

5 Q Were there days where you didn't have to wake up at 2:00 a.m.
6 in the morning?

7 A That was in 2017?

8 Q We will get there.

9 A Yes.

10 Q So 2017, there were some days when you didn't get up at
11 2:00 a.m.?

12 A One day, and it was rare.

13 Q Okay. And then you worked how many days a week?

14 A If we would work every day we would work every day.

15 Q Okay. And Tony on your crew is the one who was tracking the
16 time?

17 A Yes.

18 Q Did you track your time separately?

19 A It was the same routine. So we didn't have to check on the
20 time, we knew we start at 2:00 a.m. and we work until 10:00.

21 Q Did you get paid weekly or every other week? How did you get
22 paid?

23 A Weekly, but sometimes we not have time to go there and cash
24 the checks, so we hold it for the next week or something like
25 that.

1 Q Okay. So you were paid weekly?

2 A Sometimes.

3 Q And so how much were your checks back then?

4 A When we first got here one was a \$300 check.

5 Q What is the most that you made?

6 A In 2017 say 700, 600.

7 Q A week?

8 A Sometimes.

9 Q Okay. You stated in your complaint that you weren't paid for
10 all the hours that you worked in 2017. We will get to the
11 other years shortly.

12 A Yes, exactly.

13 Q How do you know you weren't paid for all the hours that you
14 worked?

15 A We worked from 2:00 to 9:00 or 10:00 p.m. and we worked the
16 whole week. It was not possible to make six or seven hundred
17 if we worked every day all the hours, so the tally didn't
18 match. Milton would say if I pay all the hours I am going to
19 pay you too much.

20 Q Okay. So you -- did you keep track then of the hours that you
21 worked and how much you should have been paid?

22 A In 2017 it was my cousin. He said we are going to work hard.
23 We will make enough to do something good in Guatemala, when
24 you knew that we were making a little bit of money even if you
25 worked the whole day.

1 Q So you were working about what, 19 hours a day, right, from
2 2:00 a.m. to 9:00 p.m.?

3 A Yes.

4 Q And in a couple of your allegations you said you worked until
5 10:00 o'clock, so it would have been twenty hours, right?

6 A Yes.

7 Q And how much were you getting paid an hour back then?

8 A About \$12 and some cents. I don't remember exactly.

9 Q We will use \$12.65. I think it is close. I will check just
10 so we can know. Nineteen hours a day times \$12.65 an hour,
11 that's \$240 a day that you should have been getting paid,
12 right?

13 A How much?

14 Q \$240 a day. You said you worked every day, seven days so
15 times seven days you should have made around \$1,700 a week,
16 right?

17 A Yes.

18 Q And you're saying that you only got paid between \$300 and \$700
19 a week?

20 A Yes.

21 Q Okay. And because it was your first time here, because he was
22 your cousin, you didn't want to complain about it?

23 A We were excited to be here.

24 Q Okay. So 2018 you decided to come back?

25 A Yes.

1 Q And this time you brought your brother?

2 A Yes, I gave the money to him, the \$2,500.

3 Q You paid for Hervil. Did you pay for yourself?

4 A I told him I was going to take care of that in cash, but to
5 give me time because I didn't have the whole amount.

6 Q Well, in 2018 you say that you paid for Hervil for money that
7 you had in the bank account here, right?

8 A I had my ex, my girl, I was hoping to get a house. Because
9 they don't speak with illegal because they are going to fill
10 your head with stuff. But I would say this work is hard, so I
11 need to have a better future. That is when I spoke with him.
12 I said my brother wants to come. But -- I'm sorry, I have to
13 ask to clarify. So I say I was going to put his name under
14 the same account so he can have access to it so he can
15 withdraw from that bank.

16 Q Okay. How much money was in that account when you left in
17 2017?

18 A I left my brother's money. I don't remember.

19 Q You don't remember how much was in there?

20 A I just want him to have money for the trip and brother had in
21 cash the money for the trip from Guatemala.

22 Q So for 2018 you paid for Hervil from your funds at the bank
23 here in Michigan?

24 A In 2017 I left the money before I left.

25 Q Okay. How much money did you make in 2017?

1 A To her or in Guatemala?

2 Q From when you worked from July to November.

3 A To save and to renew the contract was \$18,000.

4 Q That is what you saved?

5 A Yes.

6 Q So from let's say July until mid November of 2017, based on
7 the exchange rates from the quetzal in 2017, you were only
8 able to save up \$2,400?

9 A To bring to Guatemala. I spoke to my ex who lives here and I
10 say I am going to send you this money. But please don't spend
11 it because it's hard to make it. It is just not coming from
12 the sky. So I was talking to her about that.

13 Q So you would send money to Guatemala while you were here?

14 A Yes, a little bit I would send.

15 Q What you are saying is when you left here you took with you in
16 cash about \$2,500?

17 A It was \$18,000, I didn't tell you it was \$2,500.

18 Q That's fair. So \$18,000 quetzal, 2017 November. And you left
19 at least \$2,500 in your bank account here in Michigan, right?

20 A Yes.

21 Q Okay. And when did you talk to Milton about Hervil?

22 A He said he was going to bring more people and I told him -- I
23 say help me to bring my brother, put him in the group in 2018.

24 Q So when did you have that conversation with him?

25 A I don't remember exactly, but it was in 2017.

1 Q Before you went back?

2 A Yes.

3 Q Okay. And when were you supposed to pay him the \$2,500 then
4 for Hervil?

5 A Others that want to be here. They say hey Milton, here is the
6 money in cash or they had the money over there, always.

7 Q But I am asking about you. When did you have to have the
8 money to Milton for Hervil and for yourself?

9 A My money to pay Milton for me to come back I was saving that
10 little by little. And forever I decided to save the checks,
11 not to touch that.

12 Q My question was, when did you have to pay for Hervil.

13 A I told him that the money is in my account to bring my brother
14 and it's because he also has access to my account, I said just
15 get it out.

16 Q So there was two checks, right.

17 (Exhibit 6 was marked)

18 Q All right. So these are the checks that you say authorized
19 Milton to cash for Hervil's \$2,500 fee, right?

20 A Yes.

21 Q That first check, it was issued on January 10, 2018. Correct?

22 A Yes.

23 Q And then the next check is in March 16, 2018?

24 A Yes.

25 Q Do you have any reason -- do you know of any reason why, if

1 they wanted to charge you the \$2,500 as you say and the money
2 in the account was for the payment of a Hervil \$2,500
3 recruitment fee, do you know why they wouldn't have just
4 written the check for \$2,500?

5 A Can you repeat the question?

6 Q Can you read it back.

7 (At 4:16 p.m. question was read back as follows)

8 COURT REPORTER: Do you have any reason -- do you
9 know of any reason why, if they wanted to charge you
10 the \$2,500 as you say and the money in the account
11 was for the payment of a Hervil \$2,500 recruitment
12 fee, do you know why they wouldn't have just written
13 the check for \$2,500?

14 A They didn't know why they did it that way.

15 Q Okay.

16 A You can see in this sheet I was still in Guatemala and they
17 got the money out. This money was used for the expenses that
18 they did.

19 Q When you -- you had to go to the bank to open up the account,
20 correct?

21 A We went with him.

22 Q Who did you meet with at the bank?

23 A With an American and he translate.

24 Q What was your understanding of why you needed to have a bank
25 account?

1 A To change the checks.

2 Q Okay. And did you have a way to withdraw money from the
3 account?

4 A When Milton would take us and he would cash our checks.

5 Q Did you have an ATM card or anything or like a debit card?

6 A A debit.

7 Q Okay. So you could take out your money anytime you wanted to,
8 right?

9 A Yes.

10 Q And so for 2018, when did you pay your \$2,500 of the
11 recruitment fee?

12 A It was before coming back to Guatemala.

13 Q While you were still here?

14 A Yes.

15 Q Okay. So in 2017, before you left to Guatemala, you paid
16 Milton the \$2,500 for 2018, correct?

17 A I gave that to him in cash.

18 Q Yeah. But you paid it off while you were still here?

19 A I spoke with him and I said I was going to pay for my brother
20 and I said if I don't have enough for my fee, I'm going to pay
21 you and then he said no worries, we can make a plan and you
22 can pay me.

23 Q But I just asked you and you said you paid him before you
24 left.

25 A Exactly. Because that was a lot of money. So I asked him to

1 explain I was going to give him a little bit of money.

2 Q You didn't pay him the \$2,500 for you before you left
3 Michigan?

4 A I spoke with Milton and I told him I going to pay you little
5 by little here, the money for me to come next year.

6 Q In Michigan?

7 A In Michigan he said give that to me in cash because I don't
8 want that in the account. I said that is fine. And then I
9 said in case I don't have enough money for me, because I am
10 going to pay you for my brother I can pay you next year when I
11 come here and he say yes, then I pay that. And then with the
12 apples, that went away.

13 Q My question was you already had \$2,500 in the bank, at least
14 \$2,500, right?

15 A That money he cash that in 2018.

16 Q Exactly. Before you left for Guatemala, in 2017, you had
17 \$2,500 cash at least in the bank account, correct?

18 A Yes.

19 Q Before you left Michigan, how much had you paid towards the
20 \$2,500 recruitment fee to Milton?

21 A I save all of it, my fee. And I give that all to him all of
22 it.

23 Q Before you left Michigan?

24 A Yes.

25 Q Okay. So you paid him off the \$2,500 before you left Michigan

1 and you left \$2,500 for what you received for the following
2 year, correct?

3 A Yes.

4 Q Great. You mentioned about the passports. When did you have
5 to give up your passports?

6 A Can you elaborate? Have to give up you say? When we came
7 here with Milton we start working. Then we went to the bank
8 to open the account and then he said we were going to give to
9 him the passport and the Social Security just in case they
10 were stolen or got lost.

11 Q Okay. That was the reason that he gave you?

12 A Yes.

13 Q Okay. Did you have a safe or a safety deposit box at the bank
14 or a safe in the trailer?

15 A No.

16 Q So do you know where he kept the passport and your Social
17 Security card?

18 A He said he was going to save that at his house in 2017.

19 Q When you would go cash your checks, did you have an I.D. to
20 cash the checks?

21 A Well, he will take us in the van with the passports.

22 Q You had access to your passports to cash your checks at least?

23 A Yeah, he would give it to us.

24 Q Okay.

25 A And then after that we give it to him.

1 Q 2018 you already made your \$2,500 the year before and you paid
2 for Hervil, right?

3 A For my brother, yes.

4 Q With these checks?

5 A It was already deposited.

6 Q And they had already cashed the checks, right?

7 A I gave those to him in 2017 for my brother to come in 2018.

8 Q Correct. And so when you came in 2018, your recruitment fee
9 and your brother's recruitment fee had already been paid
10 according to you, right?

11 A Yes.

12 Q Okay. Do you know when Julio paid his recruitment fee?

13 A For Julio, his sister, they support him I think.

14 Q So they paid the fee for him?

15 A They were already here, so they sent it.

16 Q His sisters?

17 A Yes.

18 Q Where are Julio's sisters? They are here in the U.S.?

19 A Yes.

20 Q For these other 60 plus workers, do you know when any of them
21 paid their \$2,500 recruitment fee?

22 A In 2017?

23 Q In any of the years.

24 A The ones who could, they paid the money, they had the money
25 here, otherwise they prefer for them to pay in Guatemala.

1 Q How do you know that is what was done?

2 A That they gave money in Guatemala?

3 Q That any of these 60 plus workers paid a recruitment fee.

4 A One time they came there with my dad. Milton was with my
5 father and he told him Uncle Mitchell want for you to save me
6 this money, I know that you are not going to steal and he said
7 yes, you can trust me. I can save that for you. No problem.
8 So I was aware of that money. Same with my parents.

9 Q How much money was that?

10 A I don't know.

11 Q How do you know what it was for?

12 A Because they were in like packages of like \$2,500. They were
13 packages with money in certain amounts of money. The people
14 that were supposed to travel were there to leave the money
15 with the family.

16 Q So what you are saying is that in 2018, many of the workers
17 had to pay a recruitment fee, paid that fee to Milton in
18 Guatemala?

19 A Yes.

20 Q And then Milton took that money to your dad's house for
21 safekeeping?

22 A So all of them brought the money to Milton's house so they
23 knew where the money was. And then Milton was kind of afraid
24 and that is when he went to my father, he said save this
25 money, I know you are going to keep it safe. And dad saved

1 that for him.

2 Q He trusted your dad because, number one, he is your uncle and
3 because your father was a law -- a former law enforcement
4 officer, right?

5 A No. He is trusted because he know we are not liar. We are
6 not thief. He knew that we are not going to take not one
7 quetzal of what he left.

8 Q How did he know that the money would be safe at your house
9 versus at one of his -- at his parent's house? Because your
10 dad was a former law enforcement officer and everybody knew
11 that, right?

12 A No. The robbers know that they are going to bring the money
13 to his house, so he came home at night and say save this
14 money. So who was going to imagine that the money was going
15 to be at my parents?

16 Q So your dad knew that all of these workers were paying this
17 money to come to the United States and he was safekeeping the
18 money for Milton? That is what you are saying?

19 A I didn't understand.

20 Q You said that a lot of the workers that had to pay the \$2,500
21 recruitment fee, paid that fee to Milton in Guatemala and then
22 Milton brought that money to your dad and you obviously knew
23 that that money was for the recruitment fees, correct?

24 A Yes. They came there -- yeah, they went to my dad's house to
25 ask him for him to save that.

1 Q Okay. 2019. When did you pay the \$2,500 fee?

2 A I'm sorry. For 2019. We left that pay before coming back.

3 Q So for 2019 you paid the recruitment fee in 2018 before you
4 left Michigan?

5 A Yes.

6 Q You paid that in cash?

7 A Yes.

8 Q Did you have any money in the bank in 2018 when you left?

9 A I don't remember. I don't know. I don't know exactly.

10 Q Okay. In 2019 do you know how many of the workers paid a
11 recruitment fee?

12 A All I knew was the same operation, some of them were giving
13 money down there in Guatemala and some would do it here.

14 Q You never saw them do it?

15 A We used to play soccer, so you can see the houses next by and
16 they came and they say we are going to need a portion of the
17 money for what Milton is going to spend.

18 Q You heard this?

19 A We were sitting by a tree when somebody came on a motorcycle.

20 Q Who was it?

21 A I don't remember exactly.

22 Q Can you think of anybody that you can name that you saw come
23 and pay the \$2,500 recruitment fee?

24 A I can remember one.

25 Q Who?

1 A They said was Patricio. He was going to travel over here.

2 Q You said "they said." I want to know who did you see?

3 A Patricio came on a motorcycle to Milton's house and he say I
4 am here to give a portion for the fee. And because he knows
5 me, we know each other, I said are you going to travel? And
6 he say yes.

7 Q Patricio Adrian Merida-Avila?

8 A Yes.

9 Q That was one of the ones we talked about earlier today that I
10 asked you specifically if they had similar claims as you, and
11 you said no.

12 A I said I don't know.

13 Q Well, you did know apparently, because he paid a recruitment
14 fee and you are saying that he violated your rights by
15 charging you a recruitment fee. And if you know Patricio paid
16 it, then obviously he has the same claim as you.

17 A Who of them is going to say I paid Milton?

18 Q That wasn't my question. My question was did they have the
19 same claims as you. You're a smart guy. You know what I
20 asked you, if they had the same claims. You said I don't
21 know. And now you're saying oh, well, I remember this one
22 time.

23 A A claim about how they work.

24 Q No, I said claims about bringing this lawsuit and one of the
25 claims that you're bringing is that you had to pay \$2,500

1 recruitment fee. That is why you turned these over to your
2 attorneys. That is what your affidavit says, right? That is
3 one of the claims?

4 A Exactly.

5 Q So now you are saying -- now you're changing your testimony
6 and you are saying well, Patricio did have that.

7 MR. O'HEARN: Objection to the characterization.

8 A I didn't say Patricio has a claim. You asked me somebody left
9 money and I say yes.

10 BY MR. ALVAREZ:

11 Q You're right. Right now that is what you said. Is there
12 anybody else of these workers that you know has a claim
13 against Milton like the one that you're bringing here today?
14 Because you have said for a lot of these so far "I don't
15 know."

16 A I don't know. I told you myself I do not know if somebody is
17 going to have the courage to say it.

18 Q The question was do you know if they have a claim, not if they
19 have the guts to bring a claim. So to be very clear, do you
20 know of anybody on this list that has a claim, not that they
21 don't have the guts to bring the claim, but they have a claim
22 like you.

23 A No one is going to be willing to.

24 Q So the answer is no, you don't know?

25 A I don't know.

1 Q Okay.

2 A But I tell you that I saw those are two different things. One
3 of the two.

4 Q Okay. I think I am just about done. Take a quick break and
5 we can let you do your cleanup.

6 (At 4:41 p.m. off the record)

7 (At 4:54 p.m. on the record)

8 BY MR. ALVAREZ:

9 Q All right. Back on the record. We are almost done. At least
10 me. All right. So we had a couple workers I am sure you know
11 by now, couple workers who said that in fact you were charging
12 them \$500 to make sure that they would be put on the list for
13 the following year to work at Purpose Point. I am assuming
14 you are going to deny that, right?

15 A I don't have authority to bring people to the company, to
16 Purpose Point.

17 Q I agree. You are the first cousin to the owner, that is a
18 pretty good position to be in in this type of work, right?

19 A I am the first cousin. He has his nephew working for Purpose
20 Point though.

21 Q You were trusted with a crew leader position, right?

22 A Could you repeat that?

23 Q You were trusted with a crew leader position because you were
24 family?

25 A No.

1 Q That wasn't why.

2 A No, not because of member of family. He spoke with me. I
3 asked him if they considered it, I should be up to the
4 challenge to be a group leader. I say I don't have any
5 authority with the rest of the people, but I said you're a
6 good worker I know you won't do anything bad, so I say if you
7 trust me because of being hard worker, I will take it.

8 Q Okay. Can you read that back again?

9 (At 4:56 p.m. question was read back as follows)

10 COURT REPORTER: You were trusted with a crew leader
11 position because you were family?

12 Q Okay. So in 2017 you were not a crew leader. That was Tony
13 Ferdy Moreno-Bamaca?

14 A Yes.

15 Q In 2018 though you did become a crew leader?

16 A Yes.

17 Q And in 2019 you were a crew leader.

18 A Yes.

19 Q Okay. And you mentioned earlier that Milton said as part of
20 the reason for giving you that position was because you were a
21 hard worker and that he knew that you wouldn't do bad things?

22 A Yes.

23 Q Did you ever drink on the job?

24 A No.

25 Q Did you ever drink out in the fields?

1 A No. I had to be the example.

2 Q I agree. So if other workers are saying from your crew that
3 you did in fact drink out in the field, they would be lying?

4 A Yes.

5 Q If one of the farmers that owns a field you and your crew were
6 working was to come to testify that he actually brought to the
7 attention of Milton that there were empty bottles of beer in
8 the field after your crew got done, would that farmer also be
9 lying?

10 A It depended. Who is the farmer?

11 Q Who are the trustworthy farmers? Who are not the trustworthy
12 farmers?

13 A Sometimes they have their own groups of Mexicans that would
14 work in one location. They came to work and we went there to
15 help them.

16 Q Okay. So it's possible that there was drinking on the field,
17 but it wasn't you or your crew?

18 A They didn't drink.

19 Q And so if members of your crew, 2018, 2019 say that you
20 charged them \$500 recruitment fee basically and that they paid
21 you in cash, that would not be true?

22 A Furthermore in 2018 Milton gathered all the group leaders and
23 he asked all the group leaders what worker is lazy, what
24 workers do not listen and whoever is lazy I could not let that
25 go, because I am not going to complicate my life.

1 Q But that doesn't answer my question. If a worker on your crew
2 says that they paid you cash for a recruitment fee basically
3 so that you make sure that they could be on the list the
4 following year, would that be lying?

5 A If they say that I charge money to them, they're lying because
6 I did not charge them, not even a dollar.

7 Q Can you prove that?

8 A Can they prove that I asked them for money?

9 Q Well, it's kind of like you and Julio and Leonel and Darwin
10 saying that they paid in cash for the recruitment fee. Right?

11 A I don't understand that.

12 Q Let's say for example Julio, Julio says that he also paid a
13 \$2,500 recruitment fee, that he paid it in cash, right?

14 A Yes.

15 Q How can he prove that he paid it in cash?

16 A Maybe Julio's sister who are here, but they are not going to
17 talk because when Julio escape they said for them to surrender
18 Julio.

19 Q I am asking you. How can you prove that these workers that
20 say they paid you \$500 cash are lying?

21 A Were they in my group?

22 Q Yes.

23 A Who was giving them their paychecks? Who was paying them
24 their checks?

25 Q How can you prove that they didn't pay you \$500 in cash?

1 A Any moment if they were like you and I here, which day did you
2 give money to me. So now they are not there, they are going
3 to agree with you.

4 Q I agree.

5 A If they come here and say I gave you \$500, I say when did you
6 give that to me?

7 Q If they can't prove they gave it to you, then that is a lie,
8 correct?

9 A They are right in favor of somebody.

10 Q If they can't prove it?

11 MR. O'HEARN: We are at the end of the day. This is
12 like argumentative and speculative. I don't think it is
13 leading anywhere.

14 BY MR. ALVAREZ:

15 Q So if they can't prove that they gave you that money, it's a
16 lie, correct?

17 A They are simply saying something that they didn't give me.

18 Q It is their word against yours, correct?

19 A I don't know. It's like you say that you gave \$2,500, Milton
20 said next year, cousin. I say he is lying. How I going to
21 prove he is lying?

22 Q Absolutely. Yes.

23 A I let him know he is coming here saying Luis is lying why, why
24 I am lying? That is the proof.

25 Q That is two checks. Where is the proof of the other cash

1 payment that you made in 2017, 2018 and 2019? Because this
2 check was for Hervil.

3 A They were checks on them to do three checks to get that amount
4 of money.

5 Q So are you saying there were other checks that were drop from
6 that account to pay recruitment fees?

7 A They are saying two checks. I am saying they only they know
8 how they did it.

9 Q Okay. We're good.

10 MR. O'HEARN: We're done. PDF.

11 MR. ALVAREZ: PDF.

12 (At 5:07 p.m. deposition concluded.)
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LUIS GOMEZ-ECHEVERRIA v PURPOSE POINT HARVESTING
GOMEZ-ECHEVERRIA, LUIS 03/07/2024

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* * * *

CERTIFICATE

STATE OF MICHIGAN)
COUNTY OF BARRY)

I certify that this transcript consisting of 166
pages, is a complete, true and correct record of the testimony
of LUIS GOMEZ-ECHEVERRIA held in this case on March 7, 2024.

I also certify that prior to taking this deposition,
LUIS GOMEZ-ECHEVERRIA was duly sworn to tell the truth.

date

Mary Howland

Signature

MARY B. HOWLAND, CSR0078, CM

My commission expires:
5/12/2025

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